



September 27, 2021

File: 0280-30

Ref: 196088

John Moonen  
John Moonen & Associates Ltd.  
5330 Montiverdi Place  
West Vancouver, BC V7W 2W8  
Email: [johnmoonen@telus.net](mailto:johnmoonen@telus.net)

Dear John Moonen:

Thank you for your email dated September 10, 2021 addressed to Ministry of Agriculture, Food and Fisheries staff, in which you requested information on when the soil and fill concerns that EcoWaste Industries Ltd. raised in relation to the Agricultural Land Reserve Use Regulation will be addressed. You followed up on September 17, 2021, to notify us of the City of Vancouver's temporary suspension of the acceptance of construction and demolition waste at its municipal landfill site. Your emails have been forwarded to me for response.

The Ministry is currently monitoring the outcomes of the ongoing reconsideration and exclusion application processes. The Ministry understands that the City of Richmond has requested a reconsideration of the Agricultural Land Commission's (ALC) decision regarding EcoWaste's application to expand and continue its non-farm use of its Richmond site. The Ministry also understands that EcoWaste has applied to exclude its Richmond site from the Agricultural Land Reserve (ALR). This application is currently before the City of Richmond.

Ministry staff will continue to monitor the ongoing reconsideration and exclusion application processes but cannot interfere as the ALC is an independent administrative tribunal. I am unable to advise on the status of potential regulatory amendments concerning the ALR.

.../2

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**Ministry of  
Agriculture, Food  
and Fisheries**

Corporate Policy  
and Priorities  
Branch

Mailing Address:  
PO Box 9120 Stn Prov Govt  
Victoria, BC V8W 9B4

Phone # 778 698-3889  
Fax # 250 387-0357

Location:  
5<sup>th</sup> floor, 545 Superior Street  
Victoria BC V8V 1T7

Web Address:  
<http://www.gov.bc.ca/agri/>



Thank you again for writing.

Sincerely,

**Ardice Todosichuk**

A/Executive Director

Corporate Policy and Priorities Branch

Ministry of Agriculture, Food and Fisheries

Phone: (250) 978-9767

Email: [Ardice.Todosichuk@gov.bc.ca](mailto:Ardice.Todosichuk@gov.bc.ca)

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**Ministry of  
Agriculture, Food  
and Fisheries**

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Mailing Address:  
PO Box 9120 Stn Prov Govt  
Victoria, BC V8W 9B4

Phone # 778 698-3889  
Fax # 250 387-0357

Location:  
5<sup>th</sup> floor, 545 Superior Street  
Victoria BC V8V 1T7

Web Address:  
<http://www.gov.bc.ca/agri/>



# City of Richmond

Malcolm D. Brodie  
Mayor

6911 No. 3 Road  
Richmond, BC V6Y 2C1  
Telephone: 604-276-4123  
Fax No: 604-276-4332  
www.richmond.ca

July 27, 2022

Kelly Greene  
MLA, Richmond-Steveston  
Parliament Buildings  
Victoria, BC V8V 1X4

Aman Singh  
MLA, Richmond-Queensborough  
Parliament Buildings  
Victoria, BC V8V 1X4

Teresa Wat  
MLA, Richmond  
North Centre  
300-8120 Granville Ave.  
Richmond, BC V6Y 1P3

Henry Yao  
MLA, Richmond South Centre  
Parliament Buildings  
Victoria, BC V8V 1X4

Dear Richmond Members of the Legislative Assembly,

**Re: Agricultural Land Reserve Exclusion Application by Montrose Industries Ltd. at  
7011 No. 7 Road & PID 024-397-423**

This is to advise that Richmond City Council, at its Council meeting held on July 25, 2022, considered the above matter and adopted the following resolution:

- (1) That authorization for Montrose Industries Ltd. to forward an Exclusion Application to the Agricultural Land Commission for removal of 7011 No. 7 Road & PID 024-397-423 from the Agricultural Land Reserve (ALR) be denied.*
- (2) That staff be directed to prepare a letter signed by the Mayor to the Minister of Agriculture, Minister of Environment, Richmond Members of Legislative Assembly (MLAs) and the Premier of BC requesting the Provincial Government consider all options to allow the existing landfill at the site to operate in the ALR under a non-farm use approval.*

On behalf of Richmond City Council, the purpose of this letter is to request the Provincial Government to consider all options to allow the existing landfill at 7011 No. 7 Road & PID 024-397-423 to operate in the Agricultural Land Reserve (ALR) under a non-farm use approval. Previous letters from Richmond City Council related to this matter were delivered to the Province (dated March 2, 2021, November 3, 2021 & June 22, 2022).

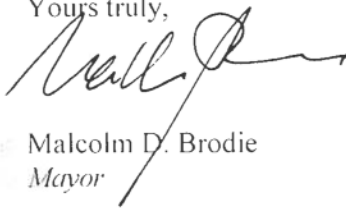
Montrose Industries Ltd., previously known as Ecowaste Industries Ltd., operates a landfill at 7011 No. 7 Road & PID 024-397-423 located within the ALR and subject to the *Agricultural Land Commission Act* (ALCA). The landfill has been permitted to operate within the ALR under non-farm use approvals by City Council and the Agricultural Land Commission (ALC), which require the site to be remediated to a state capable of soil-based agriculture upon closure of the landfill.

Due to the passage of Bill 52, which prohibited construction waste debris as permitted fill within the ALR, landfills can no longer be considered via a non-farm use application. Although the City recognizes the intent of this legislation, the City does not believe this legislation should apply to existing authorized landfill sites in the ALR prior to the adoption of this Bill.

It is requested that the Province review Bill 52 and consider all options to allow the landfill to operate in the ALR under a non-farm use application subject to City Council and ALC approval. This would allow the landfill to continue to operate under conditions acceptable to City Council and the ALC, maintain the current ALR boundary and ensure the land can be used for soil-based agriculture once the landfill is decommissioned, consistent with ALR objectives and City Council policy.

We welcome the opportunity to discuss this matter with you in further detail and respond to any questions you may have. To make these arrangements, please contact my Executive Assistant, Gillian Baker, at 604-276-4242 or [GBaker@richmond.ca](mailto:GBaker@richmond.ca).

Yours truly,



Malcolm D. Brodie  
Mayor



Page 005 of 112 to/à Page 006 of 112

Withheld pursuant to/removed as

s.12 ; s.13

## Gonzalez, Isabella AF:EX

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**From:** Minister, AFF AFF:EX  
**Sent:** March 18, 2021 4:03 PM  
**To:** 'mayorandcouncillors@richmond.ca'  
**Subject:** Response from Ministry of Agriculture, Food and Fisheries 194273

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Mayor Malcolm Brodie,

Thank you for your letter regarding review of the South Coast Panel Decision on ALC App 59139 by Ecowaste Industries Ltd. We appreciate you taking the time to write on this important issue.

On your behalf, we have provided a copy of your message to the Agricultural Land Commission for review and response.

Thank you, again, for taking the time reach out. All the best.

Kindest Regards,

Office of the Minister of Agriculture, Food and Fisheries

Email: [AFF.Minister@gov.bc.ca](mailto:AFF.Minister@gov.bc.ca) | Phone: (250) 387-1023

Page 008 of 112

Withheld pursuant to/removed as

s.14

## Gonzalez, Isabella AF:EX

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**From:** Rob Nagai <rob@nagai.ca>  
**Sent:** January 27, 2023 2:08 PM  
**To:** Minister, AF AF:EX  
**Cc:** McKay, Ashley AF:EX  
**Subject:** Ecowaste Meeting Request - Hon. Minister Agriculture Pam Alexis

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** MO Responding

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Hello,

I am working on behalf of Ecowaste Industries in Richmond. I would like to request a meeting in-person or virtually when the Minister is available. Second, that the Minister tour the the Ecowaste site in Richmond.

The meeting would be an introduction by Ecowaste's staff in Richmond as they would like to update Minister Alexis on their current operations and plans for the future of the site. The site is on ALR land.

We worked with former Minister Popham and the Minister had a an understanding of our operations as a part of our operations the Minister had a knowledge of our site as it is partly on Agriculture Land Reserve land.

We have a working relationship with the Ministry of Agriculture and Environment staff. Many of the Ministry of Environment staff toured the site last year. I would ask that Minister Alexis meet with General Manager Christian Dietrich the site as soon as her calendar is open. We have been connecting with Richmond MLAs and many city councillors to make sure that everyone is educated about Ecowaste.

I am sure of particular interest will be the proposed recycling facility they have plans to build. Eco Waste will flex their schedule to meet Minister Alexis' calendar.

If there is time later this month for a possible meeting options, I will coordinate a meeting.

Thank you in advance for your time.

Take care,

rob nagai  
Vice President  
Bluestone Government Relations  
1510 -1050 W. Pender Street  
Vancouver, BC V6E 3S7  
c 604.803.0628 | [rob@nagai.ca](mailto:rob@nagai.ca)

<https://ca.linkedin.com/in/robnagai>

<https://www.bluestonegovernmentrelations.ca/>

## Gonzalez, Isabella AF:EX

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**From:** John Moonen <johnmoonen@telus.net>  
**Sent:** January 13, 2023 2:42 PM  
**To:** Minister, AF AF:EX  
**Subject:** Ecowaste Landfill in Richmond

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** File/Info

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Minister Alexis,

I'm writing to follow up our brief chat about the landfill in Richmond which I mentioned when we met in Mission on December 9.

### Ecowaste Landfill

I am a government relations consultant for Ecowaste. The landfill has been operating since 1993 and is owned by Montrose Industries. Montrose is a privately-held local company with over 50 years of waste management experience in BC. The Ecowaste Landfill disposes of construction and demolition (C&D) waste from all over the Lower Mainland on its 160-acre site in Richmond. It recycles and diverts as much C&D waste as possible through advanced recycling technology. This aligns with the goals set by the landfill's provincial regulators (Ministry of Environment & the Agricultural Land Commission) and local ones such as Metro Vancouver and the City of Richmond.

### Why Is the Landfill Vital?

As you know from your work as an MLA and a mayor the Lower Mainland is facing a waste crisis. The amount of C&D waste keeps growing but there are only two regional landfills permitted to accept it: the Vancouver Landfill in Delta and Ecowaste. And both of these are filling up fast. In 2020 1,732,911 metric tonnes of C&D waste were generated in Metro Vancouver. Over 1,350,000 MT of it were recycled. Of the remaining 382,000 MT which required burial, Ecowaste took 57% or 216,000 metric tonnes. Some of the remaining waste was sent out-of-region landfills. This is generally not supported by your government's goals as the practice results in:

- higher costs to users, primarily in the construction industry,
- increased greenhouse gas emissions from greater use of truck and rail transportation,
- fewer local jobs,
- a greater likelihood of illegal dumping, including in the ALR, and
- lower diversion and recovery rates.

In a few years the Vancouver Landfill will be closing, leaving Ecowaste the only landfill left in the Lower Mainland accepting construction and demolition waste.

### Ecowaste's Problem

In 2019 Richmond Council unanimously supported our application to extend the term of the landfill and increase recycling facilities. The Agricultural Land Commission approved the bulk of our request. However, 2019 amendments to your ministry's ALR Use Regulation meant that, although the ALC supported our planned uses and recycling investments, it could not approve an extension of the term beyond 2035. This was because your ministry's 2019 changes to the Regulation prevented C&D waste from being deposited on land in the ALR. That amendment was intended to prevent farmers using C&D waste as fill (which we fully supported) but not to shut down landfills such as ours. However, at that time the ministry did not seem to realize our landfill was operating in the ALR.

We can only continue to provide waste recycling and disposal services to the Lower Mainland if Cabinet amends the ALR Use Regulation so that we are exempt from section 36. We would continue to be regulated by the Ministry of Environment, the ALC and local government.

If section 36 is not fixed Ecowaste will have to begin the landfill closure process in 2024 and shut down entirely in 2025.

### The Solution

Ecowaste has been working with your ministry for almost 2 years to amend the ALR Use Reg. Staff have been very helpful and professional; and they have kept us informed of their progress. As recently as January 3 we were advised by your ministry's Executive Director of Corporate Policy & Priorities Arlene Anderson that she anticipated government's decision-making process could conclude at the end of this month and she may be able to advise us of the outcome in early February. We don't know what that outcome will be, of course, but we are hoping section 36 of the ALR Use Regulation will be changed so Ecowaste can continue to operate.

I look forward to speaking with you again soon and, if your schedule permits, to give you a tour of the landfill.

Yours sincerely,

John Moonen  
John Moonen & Associates Ltd.  
(604) 921-6433 (office); (604) 786-7654 (mobile)  
[johnmoonen@telus.net](mailto:johnmoonen@telus.net)  
[www.publicaffairsnetwork.com](http://www.publicaffairsnetwork.com)



Virus-free. [www.avg.com](http://www.avg.com)

## Gonzalez, Isabella AF:EX

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**From:** Sundhu, Ellora AF:EX  
**Sent:** August 31, 2022 3:12 PM  
**To:** Chew, Ryan AF:EX  
**Cc:** MacLellan, Alyssa AF:EX  
**Subject:** Fwd: Scanned from a Xerox Multifunction Printer  
**Attachments:** Scanned from a Xerox Multifunction Printer.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi Ryan,

Can you please cliff for bullets? Looking for updates on this to provide to MLAs, if there are any updates.

Thanks,

Ellora

Get [Outlook for iOS](#)

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**From:** Li, Carven <Carven.Li@leg.bc.ca>  
**Sent:** Wednesday, August 31, 2022 2:09:35 PM  
**To:** Sundhu, Ellora AF:EX <Ellora.Sundhu@gov.bc.ca>  
**Cc:** Greene.MLA, Kelly <Kelly.Greene.MLA@leg.bc.ca>  
**Subject:** Fw: Scanned from a Xerox Multifunction Printer

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Hi Ellora,

I work for MLA Kelly Greene. Kelly would like me to send you and Jessica this letter from the City of Richmond regarding Ecowaste.

If you have any updates for the three Richmond MLAs, please do advise.

Thank you!

Carven Li | Constituency Assistant  
for Kelly Greene, MLA Richmond-Steveston | 葛凱莉 列治文-史蒂文森區 省議員  
(604) 241-8452 | [KellyGreene.ca](#) | [Like Kelly on Facebook!](#) | [Follow Kelly on Twitter!](#)





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**From:** Falkins, Paige <Paige.Falkins@leg.bc.ca>  
**Sent:** Tuesday, August 23, 2022 1:41 PM  
**To:** Li, Carven <Carven.Li@leg.bc.ca>  
**Cc:** Greene.MLA, Kelly <Kelly.Greene.MLA@leg.bc.ca>  
**Subject:** FW: Scanned from a Xerox Multifunction Printer

Mail from City of Richmond.

Paige Falkins | Legislative Assistant | New Democrat BC Government Caucus

T: 250-387-9437 | [paige.falkins@leg.bc.ca](mailto:paige.falkins@leg.bc.ca) |

<https://can01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.bcndpcaucus.ca%2F&data=05%7C01%7CKelly.Greene.MLA%40leg.bc.ca%7Cd46450659c564e5397ba08da8547ddf4%7C68f96eb1b9544ae9ab6a9a513408ba40%7C0%7C637968840953592329%7CUnknown%7CTWFpbGZsb3d8eyJWlIjoIMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6I6I1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=3ZaEwSBBnp%2Fq9NNfEvOXb0fDj2GrrIemXJvwaSmIIV%3D&reserved=0>

Proud member

-----Original Message-----

**From:** Paige.Falkins@leg.bc.ca <Paige.Falkins@leg.bc.ca>  
**Sent:** August 23, 2022 1:39 PM  
**To:** Falkins, Paige <Paige.Falkins@leg.bc.ca>  
**Subject:** Scanned from a Xerox Multifunction Printer

Please open the attached document. It was sent to you using a Xerox multifunction printer.

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Multifunction Printer Location: RM166J  
Multifunction Printer Name: NDP Caucus East Annex

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Page 015 of 112 to/à Page 016 of 112

Withheld pursuant to/removed as

s.22

## Gonzalez, Isabella AF:EX

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**From:** MacLellan, Alyssa AFF:EX on behalf of Minister, AFF AFF:EX  
**Sent:** March 29, 2022 8:55 AM  
**To:** mayorandcouncillors@richmond.ca  
**Subject:** 196755 M. Brodie Letter  
**Attachments:** 196755 Brodie Letter.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good Morning,

Please see the attached letter from the Minister of Agriculture, Food and Fisheries, Lana Popham.

**Kindest Regards,**  
**Office of the Minister of Agriculture, Food and Fisheries**  
Email: [AFF.Minister@gov.bc.ca](mailto:AFF.Minister@gov.bc.ca) | Phone: (250) 387-1023

## Gonzalez, Isabella AF:EX

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**From:** MacLellan, Alyssa AFF:EX on behalf of Minister, AFF AFF:EX  
**Sent:** August 6, 2021 10:59 AM  
**To:** 'alan@peakdisposal.com'  
**Subject:** RE: Ecowaste Industries Response  
**Attachments:** 195338 Ligumsky Letter.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good Morning,

Please see the attached letter from the Minister of Agriculture, Food and Fisheries, Lana Popham.

Kindest Regards,

**Office of the Ministry of Agriculture, Food and Fisheries**

Email: [AFF.Minister@gov.bc.ca](mailto:AFF.Minister@gov.bc.ca) | Phone: (250) 387-1023

---

**From:** Alan Ligumsky <[alan@peakdisposal.com](mailto:alan@peakdisposal.com)>  
**Sent:** July 6, 2021 2:11 PM  
**To:** Popham.MLA, Lana <[Lana.Popham.MLA@leg.bc.ca](mailto:Lana.Popham.MLA@leg.bc.ca)>  
**Subject:** Ecowaste Industries

Hi,

Please see the attached letter regarding Ecowaste Industries.

Thanks

Alan Ligumsky  
Peak Disposal Services Inc  
O 604 951 1177  
C 604 762 1224

## Gonzalez, Isabella AF:EX

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**From:** MacLellan, Alyssa AFF:EX on behalf of Minister, AFF AFF:EX  
**Sent:** August 6, 2021 10:55 AM  
**To:** 'adam@unbuilders.com'  
**Subject:** RE: EcoWaste Landfill Extension Response  
**Attachments:** 195337 Corneil Letter.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good Morning,

Please see the attached letter from the Minister of Agriculture, Food and Fisheries, Lana Popham.

Kindest Regards,

**Office of the Ministry of Agriculture, Food and Fisheries**

Email: [AFF.Minister@gov.bc.ca](mailto:AFF.Minister@gov.bc.ca) | Phone: (250) 387-1023

---

**From:** Adam Corneil <[adam@unbuilders.com](mailto:adam@unbuilders.com)>  
**Sent:** July 4, 2021 9:39 PM  
**To:** Popham.MLA, Lana <[Lana.Popham.MLA@leg.bc.ca](mailto:Lana.Popham.MLA@leg.bc.ca)>  
**Subject:** RE: EcoWaste Landfill Extension

Dear Minister Popham,

I am the founder and CEO of Unbuilders Deconstruction and Heritage Lumber. We are a group of companies that are disrupting the wasteful and archaic practice of building demolition to the more sustainable (on top of many other benefits) practice of deconstruction. I am reaching out in support of extending EcoWaste's landfill status to continue working with them in evolving the waste streams for the future.

Heritage Lumber's facility in Richmond, which is located on property owned by Ecowaste, reclaims old growth Douglas fir and cedar from old buildings, barns and structures from our subsidiary company Unbuilders. I recently learned that changes to the ALR Land Use Regulation (which apply to Ecowaste because its landfill is on land designated as part of the Agricultural Land Reserve, even though the land has never been used for agriculture) and the current height restrictions on the site could force Ecowaste to close. This would have a serious impact on our business and on the service we provide now and into the future. Our receiving yard on the property in combination with EcoWaste's proposed material recovery facility, gives the infrastructure required to shift the demolition industry to deconstruction. We receive and process reclaimed wood on site to get this valuable and primarily old growth lumber back in the supply chain.

Heritage Lumber has leased an area on the Ecowaste property since September 2020, and we have made investments in our facility. The convenient location in north Richmond reduces transportation costs and allows for reasonable rental rates versus rates seen on industrial properties within the lower mainland. As EcoWaste looks to advance the next stage of their production in diverting waste into resources, we also plan expanding on this property at the same time.

If Ecowaste was forced to shut down in Richmond because it can't secure a new allowable height limit and because amendments to the ALR Land Use Regulation aren't implemented (or because its property is not excluded from the ALR), we would have to find another site to run our operations. This would be a significant challenge given the few sites available in the Lower Mainland that offer a symbiotic and economically viable option for an operation like ours.

Heritage Lumber shares Ecowaste's commitment to environmental stewardship and best practices. Our future, and the future of the entire deconstruction industry in the region is tied to EcoWaste continuing to operate on this property. We hope that we can continue to operate at this location for years to come.

Thank you,

**Adam Corneil**  
CEO & Founder

# unbuilt

P: 1-833-UNBUILT | C: 778.996.4011  
[unbuilders.com](https://unbuilders.com) [See us on Dragons' Den](#)



## Gonzalez, Isabella AF:EX

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**From:** MacLellan, Alyssa AFF:EX on behalf of Minister, AFF AFF:EX  
**Sent:** August 6, 2021 10:40 AM  
**To:** 'jhibbard@tervita.com'  
**Subject:** RE: Tervita Letter in support of Ecowaste Response  
**Attachments:** 195276 Hibbard Letter.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good Morning,

Please see the attached letter from the Minister of Agriculture, Food and Fisheries, Lana Popham.

Kindest Regards,

**Office of the Ministry of Agriculture, Food and Fisheries**

Email: [AFF.Minister@gov.bc.ca](mailto:AFF.Minister@gov.bc.ca) | Phone: (250) 387-1023

---

**From:** Hibbard, John <[jhibbard@tervita.com](mailto:jhibbard@tervita.com)>  
**Sent:** June 28, 2021 11:09 AM  
**To:** Popham.MLA, Lana <[Lana.Popham.MLA@leg.bc.ca](mailto:Lana.Popham.MLA@leg.bc.ca)>  
**Cc:** [cdietrich@ecowaste.com](mailto:cdietrich@ecowaste.com); McCarthy, Alan <[amccarthy@tervita.com](mailto:amccarthy@tervita.com)>  
**Subject:** Tervita Letter in support of Ecowaste

Good morning Minister Popham,

Please see attached letter in support of Ecowaste in Richmond. This facility is critical to our company's success as a business in British Columbia and I hope this will act as a support of the ALC non-farm use permit extension the facility requires.

If you have any question please reach out to me at any time.

Regards,

JH

**John Hibbard, M.A.**

Director, Environmental Services Projects  
D: (604) 214-7080 C: (604) 315-2664

**Tervita Corporation**

13511 Vulcan Way, Richmond, BC Canada V6V 1K4  
M: (604) 214-7000 F: (604) 214-7017

**EARTH MATTERS** – Please think before you print

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Tervita-03-14-2012



## Gonzalez, Isabella AF:EX

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**From:** MacLellan, Alyssa AFF:EX on behalf of Minister, AFF AFF:EX  
**Sent:** July 30, 2021 4:30 PM  
**To:** 'harman.dhatt@abcrecycling.com'  
**Subject:** RE: Support for Ecowaste Response  
**Attachments:** 195234 Dhatt Letter.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good Afternoon,

Please see the attached letter from the Minister of Agriculture, Food and Fisheries, Lana Popham.

Kindest Regards,

Office of the Minister of Agriculture, Food and Fisheries

Email: [AFF.Minister@gov.bc.ca](mailto:AFF.Minister@gov.bc.ca) | Phone: (250) 387-1023

---

**From:** Harman.Dhatt <[harman.dhatt@abcrecycling.com](mailto:harman.dhatt@abcrecycling.com)>  
**Sent:** June 25, 2021 11:35 AM  
**To:** Popham.MLA, Lana <[Lana.Popham.MLA@leg.bc.ca](mailto:Lana.Popham.MLA@leg.bc.ca)>  
**Cc:** [cdietrich@ecowaste.com](mailto:cdietrich@ecowaste.com)  
**Subject:** Support for Ecowaste

Good Morning Minister Popham,

Please see attached letter offering our support to Ecowaste.

Regards,



**ABC Recycling**  
SINCE 1912

**Harman Dhatt** | Vice President, Operations  
C 604.992.8736 | P 604.522.9727  
8081 Meadow Avenue, Burnaby, BC V3N 2V9  
[www.abcrecycling.com](http://www.abcrecycling.com)  
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## Gonzalez, Isabella AF:EX

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**From:** Popham.MLA, Lana <Lana.Popham.MLA@leg.bc.ca>  
**Sent:** July 6, 2021 2:14 PM  
**To:** Minister, AFF AFF:EX  
**Subject:** FW: Ecowaste Industries  
**Attachments:** ecowaste 2021.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** CLIFFED, Draft Minister

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**From:** Alan Ligumsky <alan@peakdisposal.com>  
**Sent:** July 6, 2021 2:11 PM  
**To:** Popham.MLA, Lana <Lana.Popham.MLA@leg.bc.ca>  
**Subject:** Ecowaste Industries

Hi,

Please see the attached letter regarding Ecowaste Industries.

Thanks

Alan Ligumsky  
Peak Disposal Services Inc  
O 604 951 1177  
C 604 762 1224

## Gonzalez, Isabella AF:EX

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**From:** Popham.MLA, Lana <Lana.Popham.MLA@leg.bc.ca>  
**Sent:** July 5, 2021 9:17 AM  
**To:** Minister, AFF AFF:EX  
**Subject:** FW: EcoWaste Landfill Extension

**Categories:** Draft Minister

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

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**From:** Adam Corneil <adam@unbuilders.com>  
**Sent:** July 4, 2021 9:39 PM  
**To:** Popham.MLA, Lana <Lana.Popham.MLA@leg.bc.ca>  
**Subject:** RE: EcoWaste Landfill Extension

Dear Minister Popham,

I am the founder and CEO of Unbuilders Deconstruction and Heritage Lumber. We are a group of companies that are disrupting the wasteful and archaic practice of building demolition to the more sustainable (on top of many other benefits) practice of deconstruction. I am reaching out in support of extending EcoWaste's landfill status to continue working with them in evolving the waste streams for the future.

Heritage Lumber's facility in Richmond, which is located on property owned by Ecowaste, reclaims old growth Douglas fir and cedar from old buildings, barns and structures from our subsidiary company Unbuilders. I recently learned that changes to the ALR Land Use Regulation (which apply to Ecowaste because its landfill is on land designated as part of the Agricultural Land Reserve, even though the land has never been used for agriculture) and the current height restrictions on the site could force Ecowaste to close. This would have a serious impact on our business and on the service we provide now and into the future. Our receiving yard on the property in combination with EcoWaste's proposed material recovery facility, gives the infrastructure required to shift the demolition industry to deconstruction. We receive and process reclaimed wood on site to get this valuable and primarily old growth lumber back in the supply chain.

Heritage Lumber has leased an area on the Ecowaste property since September 2020, and we have made investments in our facility. The convenient location in north Richmond reduces transportation costs and allows for reasonable rental rates versus rates seen on industrial properties within the lower mainland. As EcoWaste looks to advance the next stage of their production in diverting waste into resources, we also plan expanding on this property at the same time.

If Ecowaste was forced to shut down in Richmond because it can't secure a new allowable height limit and because amendments to the ALR Land Use Regulation aren't implemented (or because its property is not excluded from the ALR), we would have to find another site to run our operations. This would be a significant challenge given the few sites available in the Lower Mainland that offer a symbiotic and economically viable option for an operation like ours.

Heritage Lumber shares Ecowaste's commitment to environmental stewardship and best practices. Our future, and the future of the entire deconstruction industry in the region is tied to EcoWaste continuing to operate on this property. We hope that we can continue to operate at this location for years to come.

Thank you,

**Adam Corneil**  
CEO & Founder

# unbuilt

P: 1-833-UNBUILT | C: 778.996.4011  
[unbuilders.com](http://unbuilders.com) [See us on Dragons' Den](#)



## Gonzalez, Isabella AF:EX

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**From:** Popham.MLA, Lana <Lana.Popham.MLA@leg.bc.ca>  
**Sent:** June 28, 2021 11:20 AM  
**To:** Minister, AFF AFF:EX  
**Subject:** FW: Tervita Letter in support of Ecowaste  
**Attachments:** MoA - Minister Popham - Tervita Letter Supporting Ecowaste.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** CLIFFED, Draft Minister

**[EXTERNAL]** This email came from an external source. Only open attachments or links that you are expecting from a known sender.

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**From:** Hibbard, John <jhibbard@tervita.com>  
**Sent:** June 28, 2021 11:09 AM  
**To:** Popham.MLA, Lana <Lana.Popham.MLA@leg.bc.ca>  
**Cc:** cdietrich@ecowaste.com; McCarthy, Alan <amccarthy@tervita.com>  
**Subject:** Tervita Letter in support of Ecowaste

Good morning Minister Popham,

Please see attached letter in support of Ecowaste in Richmond. This facility is critical to our company's success as a business in British Columbia and I hope this will act as a support of the ALC non-farm use permit extension the facility requires.

If you have any question please reach out to me at any time.

Regards,

JH

**John Hibbard, M.A.**  
Director, Environmental Services Projects  
D: (604) 214-7080 C: (604) 315-2664

**Tervita Corporation**  
13511 Vulcan Way, Richmond, BC Canada V6V 1K4  
M: (604) 214-7000 F: (604) 214-7017

[www.tervita.com](http://www.tervita.com)

**EARTH MATTERS** – Please think before you print

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## Gonzalez, Isabella AF:EX

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**From:** Popham.MLA, Lana <Lana.Popham.MLA@leg.bc.ca>  
**Sent:** June 25, 2021 12:53 PM  
**To:** Minister, AFF AFF:EX  
**Subject:** FW: Support for Ecowaste  
**Attachments:** Ecowaste Support Letter - ABC Recycling.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** CLIFFED, Draft Minister

**[EXTERNAL]** This email came from an external source. Only open attachments or links that you are expecting from a known sender.

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**From:** Harman.Dhatt <harman.dhatt@abcrecycling.com>  
**Sent:** June 25, 2021 11:35 AM  
**To:** Popham.MLA, Lana <Lana.Popham.MLA@leg.bc.ca>  
**Cc:** cdietrich@ecowaste.com  
**Subject:** Support for Ecowaste

Good Morning Minister Popham,

Please see attached letter offering our support to Ecowaste.

Regards,



**Harman Dhatt** | Vice President, Operations  
C 604.992.8736 | P 604.522.9727  
8081 Meadow Avenue, Burnaby, BC V3N 2V9  
[www.abcrecycling.com](http://www.abcrecycling.com)  
Follow us on: [LinkedIn](#) | [Facebook](#) | [Instagram](#)

**ABC Recycling**  
SINCE 1912



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## Gonzalez, Isabella AF:EX

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**From:** Minister, AFF AFF:EX  
**Sent:** May 4, 2021 11:53 AM  
**To:** 'Janice Murray'  
**Cc:** Grout, Kim ALC:EX; Lachance, Luc ENV:EX; johnmoonen@telus.net; paul.henderson@metrovanvancouver.org  
**Subject:** Response from Ministry of Agriculture, Food and Fisheries 194475 RE: Correspondence from Ecowaste Industries Ltd.  
**Attachments:** 194475 Response.pdf  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good Morning,

Please see the attached letter from the Minister of Agriculture, Food and Fisheries, Lana Popham.

Kindest Regards,

Office of the Minister of Agriculture, Food and Fisheries

Email: [AFF.Minister@gov.bc.ca](mailto:AFF.Minister@gov.bc.ca) | Phone: (250) 387-1023

---

**From:** Janice Murray  
**Sent:** March 31, 2021 6:11 PM  
**To:** Popham.MLA, Lana LASS:EX ; Minister, AFF AFF:EX  
**Cc:** Anderson, Arlene AFF:EX ; Grout, Kim ALC:EX ; Lachance, Luc ENV:EX ; johnmoonen@telus.net; paul.henderson@metrovanvancouver.org  
**Subject:** Correspondence from Ecowaste Industries Ltd.

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Dear Minister,

Attached please find correspondence from Mr. Thomas G. Land, President and CEO, Ecowaste Industries Ltd. for your attention.

Kind regards,  
Janice

**Janice Murray**  
Executive Assistant / Assistant Corporate Secretary

Direct: (236) 454-2642

100 – 3031 Viking Way  
Richmond BC V6V 1W1



## Gonzalez, Isabella AF:EX

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**From:** Minister, AFF AFF:EX  
**Sent:** April 7, 2021 11:59 AM  
**To:** 'mayorandcouncillors@richmond.ca'  
**Subject:** Response from Ministry of Agriculture, Food and Fisheries 194273  
**Attachments:** 194273 Response.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good Afternoon,

Please see the attached letter from the Minister of Agriculture, Food and Fisheries, Lana Popham.

Kindest Regards,

Office of the Minister of Agriculture, Food and Fisheries

Email: [AFF.Minister@gov.bc.ca](mailto:AFF.Minister@gov.bc.ca) | Phone: (250) 387-1023

## Gonzalez, Isabella AF:EX

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**From:** Janice Murray <jmurray@montroseproperties.com>  
**Sent:** March 31, 2021 6:11 PM  
**To:** Popham.MLA, Lana LASS:EX; Minister, AFF AFF:EX  
**Cc:** Anderson, Arlene AFF:EX; Grout, Kim ALC:EX; Lachance, Luc ENV:EX; johnmoonen@telus.net; paul.henderson@metrovancover.org  
**Subject:** Correspondence from Ecowaste Industries Ltd.  
**Attachments:** 210331 Ecowaste - Letter to Ministry of Agriculture.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** CLIFFED, Draft Minister

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Dear Minister,

Attached please find correspondence from Mr. Thomas G. Land, President and CEO, Ecowaste Industries Ltd. for your attention.

Kind regards,  
Janice

**Janice Murray**  
Executive Assistant / Assistant Corporate Secretary

Direct: (236) 454-2642

100 – 3031 Viking Way  
Richmond BC V6V 1W1



## Gonzalez, Isabella AF:EX

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**From:** Minister, AFF AFF:EX  
**Sent:** March 18, 2021 4:03 PM  
**To:** 'mayorandcouncillors@richmond.ca'  
**Subject:** Response from Ministry of Agriculture, Food and Fisheries 194273

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Mayor Malcolm Brodie,

Thank you for your letter regarding review of the South Coast Panel Decision on ALC App 59139 by Ecowaste Industries Ltd. We appreciate you taking the time to write on this important issue.

On your behalf, we have provided a copy of your message to the Agricultural Land Commission for review and response.

Thank you, again, for taking the time reach out. All the best.

Kindest Regards,

Office of the Minister of Agriculture, Food and Fisheries

Email: [AFF.Minister@gov.bc.ca](mailto:AFF.Minister@gov.bc.ca) | Phone: (250) 387-1023



100 – 3031 Viking Way,  
Richmond, BC, Canada  
V6V 1W1

T (604) 276-9511  
F (604) 270-4185

March 31, 2021

Hon. Lana Popham  
Minister of Agriculture, Food and Fisheries  
PO Box 9043 STN PROV GOVT  
Victoria, BC V8W 9E2

Dear Minister,

**RE: ALR Use Regulation – Request for amendment**

I am writing to you in my capacity as President and CEO of Ecowaste Industries Ltd., which owns and operates the Ecowaste Landfill in Richmond. The purpose of this letter is to:

1. alert you to the possibility that our landfill may be forced to close in 2035 as a result of the 2019 amendment to the ALR Use Regulation prohibiting certain types of demolition, land clearing and construction waste and
2. suggest a minor amendment to the new prohibited fill regulation to exempt those commercial landfills authorized to accept such waste by the Ministry of Environment and Climate Change Strategy (MOE) if it was not your government's intention to force the landfill to close.

**Background**

Ecowaste has 50 years of waste management experience in Richmond. From 1971 to 1986, the company (then called Richmond Landfill Ltd.) operated a municipal solid waste landfill on 65 hectares of land. As that site was being filled, Ecowaste purchased the two Agricultural Land Reserve (ALR) properties on which it currently operates the landfill. There is no record of either of these properties ever having been farmed, and the peat and topsoil were removed over a period of several decades starting in World War II.

The authority to operate the demolition, land clearing and construction Ecowaste Landfill is granted by Operational Certificate 4922 issued by the MOE under section 28 of the *Environmental Management Act* and in accordance with the Metro Vancouver Solid Waste Management Plan. An operating permit was initially issued by the MOE in 1986. That permit was converted to an operational certificate in 1992, amended in December 2004 and updated to the current operational certificate dated September 6, 2017. Under section 1.1.5 of the certificate, the types of waste that can be accepted by Ecowaste and deposited as fill include construction, demolition and landfill clearing debris, contaminated soils and other wastes.

The landfill also operates under License L-005 issued by the Greater Vancouver Sewerage & Drainage District (GVS&DD) and License C-007 issued by the GVS&DD for the Yard Waste Compost Operation.

The operational certificate issued by MOE authorizes us to accept the following products in our landfill: wood products (including composite, dimensional lumber, flooring, shakes, shingles, pallets and saw dust); asphalt; building materials; rubble; plastic; and other materials including land clearing debris, metal, textiles, soil, paper, carpet, various types of roofing, rubber, aggregate, masonry, concrete and insulation.

However, some of the types of waste authorized by the MOE's operational certificate are the materials prohibited as fill under the new section 36(1) of the ALR Use Regulation:

- a. construction or demolition waste, masonry rubble, concrete, cement, rebar, drywall and wood waste;
- b. asphalt;
- c. glass;
- d. synthetic polymers;
- e. treated wood; and
- f. unchipped lumber.

The Ecowaste Landfill is the only fully licensed and bonded disposal option in the region for such waste. The Vancouver Landfill in Delta offers limited disposal options for these types of waste, but is not located in the ALR and is therefore not subject to the amended regulations. However, the Vancouver Landfill discourages intake of demolition, land clearing and construction waste because of its emphasis on preserving its limited capacity for receiving general municipal solid waste.

Over the past 30 years, Ecowaste has continually invested in recycling operations at the site. Our operations now convert yard waste into compost, clean wood into biofuels and concrete into aggregate. We also provide an area of the landfill for treating contaminated soils through bioremediation and storage. We do not accept hazardous waste.

Approximately 30% of the materials received at the landfill are currently recycled and/or recovered to be sold. Some of the recycled materials – including concrete, yard waste, glass, tile, asphalt millings and asphalt shingles – are approved for beneficial use on site and for landfill closure activities. If Ecowaste pursues its intent to invest in a state-of-the art materials recovery facility, it has the potential to recycle 80% of the received volumes of waste, and less than 20% of received volumes will be disposed of in the landfill.

#### Permits and Authorizations

In addition to the MOE Operational Certificate and Metro Vancouver licenses referred to above, the Ecowaste Landfill has been approved by the provincial Agricultural Land Commission (ALC) for non-farm use in the Agricultural Land Reserve (ALR). We received initial approval in 1993 with ALC Resolution #173/93 and this non-farm use approval was renewed in 1998. Subsequently, in 2015 under ALC resolutions #384/2015 and #385/2015, the ALC approved our request to locate four materials recovery facility (MRF) operations on the property related to the existing landfill and to continue the operation of the landfill for a period of 20 years, or until 2035.

In 2019 we applied to the ALC to:

- a. replace one of the MRF's operators;
- b. increase the footprint of that MRF;
- c. operate two additional MRFs and
- d. extend the term of our operations until 2055.

Items (a) through (c) were approved by the Commission in Resolution #504/2020 but item (d) was not. The Panel specifically referred to section 36(1) of the ALR Use Regulation to justify its refusal to grant an extension:

*36(1) Except as permitted under subsection (2), the following must not be used as fill on agricultural land: (a) construction or demolition waste, including masonry rubble, concrete, cement, rebar, drywall and wood waste; (b) asphalt; (c) glass; (d) synthetic polymers; (e) treated wood; (f) unchipped lumber.*

The ALC Panel determined that although some materials received at the landfill were removed after recycling/recovery, because other materials would remain on the landfill they were considered to be prohibited fill as defined in section 36(1). The Panel then applied section 23(1) of the Agricultural Land Reserve General Regulation:

*23(1) Subject to subsection (2), the Commission must reject an application for permission to place fill on agricultural land if the fill to be placed includes any of the materials referred to in section 36 of the Agricultural Land Reserve Use Regulation.*

Our research into the 2019 changes suggests that when section 36(1) of the ALR Use Regulation was being developed your ministry may not have been informed that the Ecowaste Landfill was in the ALR and that it was already authorized to deposit the materials proposed for prohibition. Even if the ministry were aware, your officials might have believed – as we did – that because the landfill operated with an operational certificate issued under the *Environmental Management Act* (which prevails over the *Agricultural Land Commission Act*), the new prohibited fill regulation would not apply. We only became aware of the problem when the ALC informed us in October 2020 that it believed it was unable to extend the term of our non-farm use approval to 2055 because of the new prohibited fill regulation.

#### Preventing Illegal Dumping

We have always supported government's efforts to stop the illegal dumping of waste, which is a potentially hazardous action with negative impacts on human health and the environment. We understand that the revisions to the ALR Use Regulation were motivated by the justified desire to stop this practice, which has grown in recent years. Many landowners with properties in the ALR have illegally accepted waste and were able to do so because dumping was not regulated. They could charge a very low cost as they were not investing in recycling facilities or applying any engineered controls to prevent harm to human health and the environment.

We are a regulated business operating under the strict requirements of our operational certificate and in compliance with all regulations. As such, the Ecowaste Landfill offers a valuable and essential service to Metro Vancouver. Our operations recycle and safely dispose of construction and demolition waste, provide sustainable jobs to local residents, reduce illegal dumping and its negative impacts on the environment, and reduce the increased greenhouse gas emissions associated with having to transport waste out of the region for disposal.



As the City of Richmond said as recently as March 2, 2021, in a separate letter to the ALC about the Ecowaste Landfill:

*"The landfill operation plays an important role in the City's and regional demolition and construction waste and recycling program, including significant environmental benefits associated with the increased recycling capacity of the facility, and will soon be the only landfill of any type in the region (anticipated in 2028)."*

The Ecowaste Landfill is part of the solution to the problem of illegal dumping. We salute you for taking action against the practice. However, we do not believe it was government's intent to effectively shut down a facility authorized by the MOE, Metro Vancouver, the City of Richmond and the ALC to accept demolition, land clearing and construction waste. If the Ecowaste Landfill is shut down, the problems of illegal dumping of both demolition, land clearing and construction waste and other waste on ALR and non-ALR lands will only get worse.

#### Proposed Solution

If you agree that the recent prohibited fill provisions in the ALR Use Regulation were not intended to shut down a landfill specifically authorized to accept and process demolition, land clearing and construction waste, we would like to suggest that a minor amendment be made to section 36(1) of the ALR Use Regulation, as follows:

36 (1) Except as permitted under subsection (2) or as authorized by the Ministry of Environment and Climate Change Strategy under the Environmental Management Act, the following must not be used as fill on agricultural land:

- (a) construction or demolition waste, including masonry rubble, concrete, cement, rebar, drywall and wood waste;*
- (b) asphalt;*
- (c) glass;*
- (d) synthetic polymers;*
- (e) treated wood;*
- (f) unchipped lumber.*

A consequential amendment to section 23 of the Agricultural Land Reserve General Regulation may also be required, perhaps with the addition of a new subsection (3):

23 (3) Notwithstanding subsection (1) the commission may accept an application for permission to place fill including any of the materials referred to in section 36 of the Agricultural Land Reserve Use Regulation if the fill is to be placed in a landfill authorized by the Ministry of Environment and Climate Change Strategy under the Environmental Management Act.

More information and images outlining our operation, including a drone video, maps and other materials can be viewed at [www.ecowaste.com](http://www.ecowaste.com). I would also be pleased to show you and your officials the landfill and provide any additional information you require.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read 'T. Land', enclosed within a thin black rectangular border.

Thomas G. Land  
President & CEO  
Ecowaste Industries Ltd.

Cc: Arlene Anderson, Director of Policy & Legislation, Ministry of Agriculture  
Kim Grout, CEO, Agricultural Land Commission  
Luc Lachance, Section Head, Mining, Ministry of Environment and Climate Change Strategy  
Paul Henderson, General Manager Solid Waste, Metro Vancouver  
John Moonen, John Moonen & Associates Ltd.



April 7, 2021

File: 0280-30  
Ref: 194273

His Worship Mayor Malcolm Brodie  
City of Richmond  
6911 No. 3 Road  
Richmond, BC V6Y 2C1  
Email: [mayorandcouncillors@richmond.ca](mailto:mayorandcouncillors@richmond.ca)

Dear Mayor Malcolm Brodie:

Thank you for your letter dated March 2, 2021 which requested that I review the Agricultural Land Commission (ALC) decision on Application #59139 (Ecowaste Industries Ltd).

I have contacted the Agricultural Land Commission for further information and am advised that the City of Richmond has already submitted a letter to the Agricultural Land Commission requesting a reconsideration of Resolution #504/2020. I am also advised that the request will be reviewed as per the criteria established by the *ALC Act* and regulation.

In addition, it would be inappropriate for me to interfere with, or be involved in the decision-making authority of the Agricultural Land Commission as it is an administrative tribunal, independent from government.

I have forwarded a copy of your letter to the ALC so that it can review the arguments contained therein, to confirm that all the arguments submitted by the City of Richmond in support for the reconsideration request are provided to the ALC.

Thank you for your interest in this matter.

Sincerely,

Lana Popham  
Minister



May 4, 2021

File: 0280-30

Ref: 194475

Thomas G. Land  
President & CEO  
Ecowaste Industries Ltd.  
100 - 3031 Viking Way  
Richmond, BC V6V 1W1  
Via Email: [jmurray@montroseproperties.com](mailto:jmurray@montroseproperties.com)

Dear Thomas G. Land:

Thank you for your letter dated March 31, 2021, outlining the possibility that Ecowaste Industries Ltd.'s landfill may close in 2035 as a result of the 2019 amendments to the Agricultural Land Reserve Use Regulation relating to soil and fill.

In your letter, you advise that your company has operated its landfill on the Agricultural Land Reserve (ALR) for many years and that the Agricultural Land Commission (ALC) has approved this non-farm use since 1993. You also advise that the ALC has recently approved the continued non-farm use of the ALR for your landfill until 2035, but that it is unable to extend this approval to 2055 because of recent soil/fill regulation amendments. I have directed ministry staff to look into this matter. Once this review is completed, my office will provide you with further information.

I appreciate you bringing this matter to my attention.

Sincerely,

Lana Popham  
Minister

cc: Kim Grout, CEO, Agricultural Land Commission  
Luc Lachance, Section Head, Mining, Ministry of Environment and Climate Change Strategy  
Paul Henderson, General Manager Solid Waste, Metro Vancouver  
John Moonen, John Moonen & Associates Ltd.



June 28, 2021

[iana.popham.MLA@leg.bc.ca](mailto:iana.popham.MLA@leg.bc.ca)

Hon. Lana Popham  
Minister of Agriculture, Food and Fisheries  
PO Box 9043 STN PROV GOVT  
Victoria, BC V8W 9E2

Dear Hon. Lana Popham,

Thank you for taking the time to review our concerns about a facility we operate in Richmond. Tervita's bioremediation facility in Richmond, which is located on property owned by Ecowaste, treats contaminated waste so that it can be safely disposed of or shipped off site. I recently learned that changes to the ALR Land Use Regulation (which apply to Ecowaste because its landfill is on land designated as part of the Agricultural Land Reserve, even though the land has never been used for agriculture) and the current height restrictions on the site could force Ecowaste to close. This would have a serious impact on our business and on the essential service we provide to organizations across the Lower Mainland to treat hazardous soils.

Tervita treats soils contaminated with hydrocarbons and/or metals in compliance with a permit issued by the Ministry of the Environment. Our process uses naturally occurring micro-organisms to break down the contaminated materials into harmless products, and the treated soils are then disposed of at the Ecowaste landfill or shipped off site for subsequent use.

Tervita has leased an area on the Ecowaste property since 2006, and we have made significant investments in our bioremediation facility. The convenient location in East Richmond reduces transportation costs and allows us to treat contaminated soils closer to the sources around Metro Vancouver. Since opening, our site has treated over 2 million tonnes of contaminated soil, resulting in a cleaner region for people and businesses to operate.

If Ecowaste was forced to shut down in Richmond because it can't secure a new allowable height limit and because amendments to the ALR Land Use Regulation aren't implemented (or because its property is not excluded from the ALR), we would have to find another site to run our operations. This would be a significant challenge given the few sites available in the Lower Mainland that offer an economically and environmentally viable option for an operation like ours.

Tervita shares Ecowaste's commitment to environmental stewardship and best practices. We hope that we can continue to operate at this location for years to come.

Sincerely,

John Hibbard  
Director, Environmental Services  
13511 Vulcan Way, Richmond BC  
V6V 1K4

**Tervita Corporation**

**Calgary Head Office**  
1600, 140 - 10th Avenue SE  
Calgary, AB T2G 0R1  
T: (403) 233-7565  
F: (403) 261-5612

**tervita.com**



Hon. Lana Popham  
Minister of Agriculture, Food and Fisheries  
PO Box 9043 STN PROV GOVT  
Victoria, BC V8W 9E2

*Dear Hon. Lana Popham,*

*We're a hauling and disposal company operating in the Lower Mainland, providing waste disposal and recycling services to our customers in the construction and demolition industry. We haul a large percentage of our waste to Ecowaste's landfill in Richmond and transfer station in New Westminster. I have learned that changes to the ALR Land Use Regulation and the current height restrictions on the site could force Ecowaste to close. This would have a serious impact on our business.*

*Companies like ours rely on Ecowaste because we know they are going to properly sort, recycle and dispose of the waste we collect. Our operators need the quick turnaround times, high levels of service and competitive fees that Ecowaste can provide. There are very few other disposal options available to us in the Lower Mainland.*

*If Ecowaste was forced to shut down in Richmond, we would have to find other landfills that might be farther away (increasing our haulers' time on the road), charge higher costs (increasing costs for our customers) and not as equipped to recycle as much material.*

*The Lower Mainland is already lacking in waste management infrastructure capacity. Without Ecowaste, available options for responsible waste disposal and recycling are severely limited. Rather than building a new landfill to meet the region's needs, we believe that amending the ALR Land Use Regulation and increasing Ecowaste's allowable height limit offer a more practical, cost-effective and environmentally appropriate solution.*

*Yours Truly*

*Alan Ligumsky  
Owner  
Peak Disposal Services Inc.*

**#5 10320 Whalley Blvd. Surrey BC V3T 4H4.  
Phone 604-951-1177  
accounting@peakdisposal.com  
Fax 604-951-1167**



August 6, 2021

File: 0280-30

Ref: 195276

John Hibbard  
Director, Environmental Services  
Tervita Corporation  
13511 Vulcan Way  
Richmond, BC V6V 1K4  
Email: [jhibbard@tervita.com](mailto:jhibbard@tervita.com)

Dear John Hibbard:

Thank you for your letter dated June 28, 2021, outlining your support for Ecowaste Industries Ltd. (Ecowaste) and your concern around the impacts that regulatory changes may have on their continued operations on the Agricultural Land Reserve (ALR).

The City of Richmond has requested a reconsideration of the Agricultural Land Commission's (ALC) decision regarding Ecowaste's application to expand and continue its non-farm use of its Richmond site. For information on reconsiderations please contact the ALC by email at [ALC.SouthCoast@gov.bc.ca](mailto:ALC.SouthCoast@gov.bc.ca) or by telephone at 1-604-660-7000.

Ecowaste has also applied to exclude its Richmond site from the ALR. This application is currently before the City of Richmond. The ALC is unable to consider this decision unless the city forwards the application to the ALC. Questions about the exclusion process can be directed to the ALC through the email and telephone number listed above.

Ministry staff are aware of the issues Ecowaste faces and have shared this information with the ALC. Ministry staff will continue to monitor the ongoing reconsideration and exclusion application processes but cannot interfere as the ALC is an independent administrative tribunal.

.../2

Thank you for taking the time to write.

Sincerely,

A handwritten signature in cursive script, reading "Lana Popham". The signature is written in a dark ink and is positioned above the printed name and title.

Lana Popham  
Minister





August 6, 2021

File: 0280-30

Ref: 195337

Adam Corneil  
CEO and Founder  
Unbuilders Deconstruction and Heritage Lumber  
Email: [adam@unbuilders.com](mailto:adam@unbuilders.com)

Dear Adam Corneil:

Thank you for your correspondence dated July 4, 2021, outlining your support for Ecowaste Industries Ltd. (Ecowaste) and your concern around the impacts that regulatory changes may have on their continued operations on the Agricultural Land Reserve (ALR).

The City of Richmond has requested a reconsideration of the Agricultural Land Commission's (ALC) decision regarding Ecowaste's application to expand and continue its non-farm use of its Richmond site. For information on reconsiderations please contact the ALC by email at [ALC.SouthCoast@gov.bc.ca](mailto:ALC.SouthCoast@gov.bc.ca) or by telephone at 1-604-660-7000.

Ecowaste has also applied to exclude its Richmond site from the ALR. This application is currently before the City of Richmond. The ALC is unable to consider this decision unless the city forwards the application to the ALC. Questions about the exclusion process can be directed to the ALC through the email and telephone number listed above.

Ministry staff are aware of the issues Ecowaste faces and have shared this information with the ALC. Ministry staff will continue to monitor the ongoing reconsideration and exclusion application processes but cannot interfere as the ALC is an independent administrative tribunal.

Thank you for taking the time to write.

Sincerely,

A handwritten signature in cursive script, reading "Lana Popham". The signature is written in a dark ink and is positioned above the printed name and title.

Lana Popham  
Minister



August 6, 2021

File: 0280-30

Ref: 195338

Alan Ligumsky, Owner  
Peak Disposal Services Inc.  
#5 10320 Whalley Blvd.  
Surrey, BC V3T 4H4  
Email: [alan@peakdisposal.com](mailto:alan@peakdisposal.com)

Dear Alan Ligumsky:

Thank you for your letter dated July 6, 2021, outlining your support for Ecowaste Industries Ltd. (Ecowaste) and your concern around the impacts that regulatory changes may have on their continued operations on the Agricultural Land Reserve (ALR).

The City of Richmond has requested a reconsideration of the Agricultural Land Commission's (ALC) decision regarding Ecowaste's application to expand and continue its non-farm use of its Richmond site. For information on reconsiderations please contact the ALC by email at [ALC.SouthCoast@gov.bc.ca](mailto:ALC.SouthCoast@gov.bc.ca) or by telephone at 1-604-660-7000.

Ecowaste has also applied to exclude its Richmond site from the ALR. This application is currently before the City of Richmond. The ALC is unable to consider this decision unless the city forwards the application to the ALC. Questions about the exclusion process can be directed to the ALC through the email and telephone number listed above.

Ministry staff are aware of the issues Ecowaste faces and have shared this information with the ALC. Ministry staff will continue to monitor the ongoing reconsideration and exclusion application processes but cannot interfere as the ALC is an independent administrative tribunal.

Thank you for taking the time to write.

Sincerely,

A handwritten signature in cursive script, reading "Lana Popham". The signature is written in a dark ink and is positioned above the printed name and title.

Lana Popham  
Minister



March 29, 2022

File: 0280-30

Ref: 196755

His Worship Mayor Malcolm D. Brodie  
City of Richmond  
6911 No. 3 Road  
Richmond, BC V6Y 2C1  
Email: [mayorandcouncillors@richmond.ca](mailto:mayorandcouncillors@richmond.ca)

Dear Mayor Brodie,

Thank you for your letter of November 3, 2021, regarding the Agricultural Land Commission's (ALC) decision on EcoWaste Industries Ltd.'s (EcoWaste) application. In your letter, you request that the ministry review the matter and consider legislative changes to allow EcoWaste's landfill to extend its operations while remaining within the ALR. I apologize for the delayed response; the combination of the wildfire season followed by intense flooding has created challenging times for the agriculture sector in our province.

I understand that EcoWaste submitted a non-farm use application to expand and extend its operations in the Agricultural Land Reserve (ALR) to 2055. This application was not approved by the ALC. The City of Richmond (the City) requested reconsideration of this decision. This request was refused by the ALC because it did not meet the legislated criteria for reconsideration. EcoWaste has requested that the City make an application to the ALC to exclude the landfill from the ALR, which will be considered by the City in the coming months.

Protecting the ALR from illegal dumping of demolition and construction waste is important to the preservation of agricultural land. Government made regulatory changes in 2019 to expressly prohibit the use of this waste as fill on the ALR. The provision of legitimate landfills to accept and manage demolition and construction waste is a critical component to protecting the entire ALR because it reduces barriers to compliance with illegal dumping restrictions.

The Ministry is looking into the matter and encourages the affected parties (e.g., EcoWaste, local government, etc.) to exhaust all available avenues to resolve this issue.

.../2

Thank you again for your follow-up communication and your continued efforts to support agriculture in the province.

Sincerely,

A handwritten signature in cursive script, reading "Lana Popham". The signature is written in a dark ink and is positioned above the printed name and title.

Lana Popham  
Minister

Page 053 of 112 to/à Page 056 of 112

Withheld pursuant to/removed as

s.14

John Moonen and Associates Ltd.  
**Government Relations, Public Affairs, Communications**  
5330 Montiverdi Place, West Vancouver, BC V7W 2W8  
(T) 604.921.6433; (C) 604.786.7654  
[johnmoonen@telus.net](mailto:johnmoonen@telus.net)  
[www.publicaffairsnetwork.ca](http://www.publicaffairsnetwork.ca)

September 28, 2021

Ardice Todosichuk, Acting Executive Director  
Corporate Policy & Priorities Branch  
Ministry of Agriculture, Food and Fisheries  
Via email: [Ardice.Todosichuk@gov.bc.ca](mailto:Ardice.Todosichuk@gov.bc.ca)

Re: Ecowaste Landfill and Recycling Centre – Your File 0280-30; Your Reference: 196088

Thank you for your letter of September 27. We have been working with the Agricultural Land Commission for nearly 30 years and fully understand that the Commission is an independent quasi-judicial administrative agency. We are not asking the Ministry to interfere with the ALC's jurisdiction while the Commission decides the City of Richmond's reconsideration request or our own exclusion application. We are simply asking the Ministry to amend s. 36 of the ALR Use Regulation to exempt our landfill, which you have the power to do.

The Ministry's responsibility for ALR regulations has been made clear on numerous occasions; you may be aware that when the ALR Use Regulation was amended in 2019 to introduce section 36 it was initiated by the Ministry, not the ALC. In fact, the change was made without input from the Commission. We do not accept that the Ministry cannot act on our request while the ALC makes decisions on either the City of Richmond's reconsideration request or our own exclusion application. Or any other application.

Your ministry has the power to correct the mistake it made in 2019 and can do so without impinging on the jurisdiction of the ALC. We are urging you to do so as soon as possible.

Yours sincerely,

*John Moonen*

John F. Moonen, B.Comm., LL.B.  
Agent

cc: Hon. Lana Popham  
cc: Geoff Meggs





July 30, 2021

File: 0280-30  
Ref: 195234

Harman Dhatt  
Vice President, Operations  
ABC Recycling  
8081 Meadow Avenue  
Burnaby, BC V3N 2V9  
Email: [harman.dhatt@abcrecycling.com](mailto:harman.dhatt@abcrecycling.com)

Dear Harman Dhatt:

Thank you for your letter dated June 22, 2021 outlining your support for Ecowaste Industries Ltd. (Ecowaste) and your concern around the impacts that regulatory changes may have on their continued operations on the Agricultural Land Reserve (ALR).

The City of Richmond has requested a reconsideration of the Agricultural Land Commission's (ALC) decision regarding Ecowaste's application to expand and continue its non-farm use of its Richmond site. For information on reconsiderations please contact the ALC by email at [ALC.SouthCoast@gov.bc.ca](mailto:ALC.SouthCoast@gov.bc.ca) or by telephone at 1-604-660-7000.

Ecowaste has also applied to exclude its Richmond site from the ALR. This application is currently before the City of Richmond. The ALC is unable to consider this decision unless the city forwards the application to the ALC. Questions about the exclusion process can be directed to the ALC through the email and telephone number listed above.

Ministry staff are aware of the issues Ecowaste faces and have shared this information with the ALC. Ministry staff will continue to monitor the ongoing reconsideration and exclusion application processes but cannot interfere as the ALC is an independent administrative tribunal.

.../2

Thank you for taking the time to write.

Sincerely,

A handwritten signature in cursive script, reading "Lana Popham". The signature is written in a light grey or blue ink.

Lana Popham  
Minister



**ABC Recycling**  
SINCE 1912

Hon. Lana Popham  
Minister of Agriculture, Food and Fisheries  
PO Box 9043 STN PROV GOVT  
Victoria, BC V8W 9E2

June 22, 2021

**Re: Ecowaste Industries Ltd.**

Dear Hon. Lana Popham,

We're Western Canada's largest scrap metal recycling company, operating since 1912 to turn waste metal into new products. Ecowaste has been a reliable partner in our supply network, providing us with a consistent, high-quality local supply of waste metal that we then process at our facilities.

I have learned that changes to the ALR Land Use Regulation (which apply to Ecowaste because its landfill is on land designated as part of the Agricultural Land Reserve, even though the land has never been used for agriculture) and the current height restrictions on the site could force Ecowaste to close.

This would have a serious impact on our business because there aren't that many other local operators with the infrastructure for sorting construction waste and pulling out metals for re-use. Our operations would have to look farther afield – and perhaps even to international markets – for source material, adding to costs and environmental impacts.

The Lower Mainland is already lacking in waste management infrastructure capacity and Ecowaste provides an essential service for sorting, processing and diverting construction waste out of the landfill so it can be re-used. Rather than building a new landfill to meet the region's needs, we believe that amending the ALR Land Use Regulation and increasing Ecowaste's allowable height limit, or excluding its property from the ALR, offer a more practical, cost-effective and environmentally appropriate solution.

Sincerely,

Harman Dhatt  
Vice President, Operations

## Avlijas, Stefan AF:EX

---

**From:** Avlijas, Stefan AF:EX  
**Sent:** February 24, 2023 9:41 AM  
**To:** Alexis, Pam AF:EX  
**Cc:** Chadwick, Jo-Anne AF:EX  
**Subject:** FOR APPROVAL: ELUC materials  
**Attachments:** s.12; s.13

**Importance:** High  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Minister,

The finalized ELUC materials are attached for your approval. I have reviewed them and believe they are satisfactory, DMO has worked well with us to provide clarification in the materials that I believe will anticipate questions.

s.13

S

Stefan Avlijas (he/him)

Chief of Staff to the Minister of Agriculture and Food  
Government of BC  
[Stefan.Avlijas@gov.bc.ca](mailto:Stefan.Avlijas@gov.bc.ca)  
M: s.17

## Avlijas, Stefan AF:EX

---

**From:** John Moonen <johnmoonen@telus.net>  
**Sent:** September 28, 2021 9:54 AM  
**To:** Todosichuk, Ardice AFF:EX  
**Cc:** Meggs, Geoff PREM:EX; Minister, AF AF:EX  
**Subject:** Ecowaste Landfill and Recycling Centre  
**Attachments:** Montrose2021TodosichukLetterSept27.pdf;  
Montrose2021TodosichukResponseSept28.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** CLIFFED, File/Info

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Please see attached response to your letter of Sept 27, also attached.

John F. Moonen, B.Comm., LL.B.  
Agent

---

**From:** Shew, Hanna AFF:EX  
**Sent:** September 27, 2021 9:28 AM  
**To:** johnmoonen@telus.net  
**Subject:** Ref 196088

File: 0280-30  
Ref: 196088

Dear John Moonen:

Please find attached a letter from Ardice Todosichuk, Acting Executive Director, Corporate Policy and Priorities Branch, B.C. Ministry of Agriculture, Food and Fisheries.

Kind regards,

Hanna Shew  
Administrative Assistant | Corporate Policy & Priorities Branch  
Ministry of Agriculture, Food and Fisheries

*I respectfully acknowledge that the lands on which I learn, work, and live are the traditional lands of the Lekwungen and WSÁNEĆ Peoples and recognize my responsibility in the collective efforts to progress reconciliation and healing for Indigenous communities.*



Virus-free. [www.avg.com](http://www.avg.com)

## Avlijas, Stefan AF:EX

---

**From:** Minister, AFF AFF:EX  
**Sent:** May 4, 2021 11:53 AM  
**To:** 'Janice Murray'  
**Cc:** Grout, Kim ALC:EX; Lachance, Luc ENV:EX; johnmoonen@telus.net; paul.henderson@metrovancover.org  
**Subject:** Response from Ministry of Agriculture, Food and Fisheries 194475 RE: Correspondence from Ecowaste Industries Ltd.  
**Attachments:** 194475 Response.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good Morning,

Please see the attached letter from the Minister of Agriculture, Food and Fisheries, Lana Popham.

Kindest Regards,

Office of the Minister of Agriculture, Food and Fisheries

Email: [AFF.Minister@gov.bc.ca](mailto:AFF.Minister@gov.bc.ca) | Phone: <sup>s.17</sup>

---

**From:** Janice Murray  
**Sent:** March 31, 2021 6:11 PM  
**To:** Popham.MLA, Lana LASS:EX ; Minister, AFF AFF:EX  
**Cc:** Anderson, Arlene AFF:EX ; Grout, Kim ALC:EX ; Lachance, Luc ENV:EX ; johnmoonen@telus.net; paul.henderson@metrovancover.org  
**Subject:** Correspondence from Ecowaste Industries Ltd.

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Dear Minister,

Attached please find correspondence from Mr. Thomas G. Land, President and CEO, Ecowaste Industries Ltd. for your attention.

Kind regards,  
Janice

**Janice Murray**  
Executive Assistant / Assistant Corporate Secretary

Direct: (236) 454-2642

100 – 3031 Viking Way  
Richmond BC V6V 1W1





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Withheld pursuant to/removed as

s.22



May 4, 2021

File: 0280-30

Ref: 194475

Thomas G. Land  
President & CEO  
Ecowaste Industries Ltd.  
100 - 3031 Viking Way  
Richmond, BC V6V 1W1  
Via Email: [jmurray@montroseproperties.com](mailto:jmurray@montroseproperties.com)

Dear Thomas G. Land:

Thank you for your letter dated March 31, 2021, outlining the possibility that Ecowaste Industries Ltd.'s landfill may close in 2035 as a result of the 2019 amendments to the Agricultural Land Reserve Use Regulation relating to soil and fill.

In your letter, you advise that your company has operated its landfill on the Agricultural Land Reserve (ALR) for many years and that the Agricultural Land Commission (ALC) has approved this non-farm use since 1993. You also advise that the ALC has recently approved the continued non-farm use of the ALR for your landfill until 2035, but that it is unable to extend this approval to 2055 because of recent soil/fill regulation amendments. I have directed ministry staff to look into this matter. Once this review is completed, my office will provide you with further information.

I appreciate you bringing this matter to my attention.

Sincerely,

Lana Popham  
Minister

cc: Kim Grout, CEO, Agricultural Land Commission  
Luc Lachance, Section Head, Mining, Ministry of Environment and Climate Change Strategy  
Paul Henderson, General Manager Solid Waste, Metro Vancouver  
John Moonen, John Moonen & Associates Ltd.

Page 068 of 112

Withheld pursuant to/removed as

s.12 ; s.13

Page 069 of 112 to/à Page 072 of 112

Withheld pursuant to/removed as

s.13

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## INFORMATION BULLETIN

[release number]  
Feb. XX, 2023

Ministry of Agriculture and Food

### **Richmond landfill removed from ALR**

RICHMOND – The Province is removing Richmond’s EcoWaste landfill from the Agricultural Land Reserve (ALR) to ensure the industrial landfill can remain in operation and continue to play an important role in the region’s construction waste disposal and recycling program.

The site has been used as an industrial landfill, primarily for construction and demolition waste, with permission from the Agricultural Land Commission (ALC), since the 1980s and holds no soil-based agriculture value. Remediation of the site to an acceptable standard is not possible and there is no potential for it to be productive farmland in the future.

The removal from the ALR will allow EcoWaste to work towards extending its operations until 2055, and not only prevent it from having to begin shutdown procedures this year, but provide long-term certainty to both the company and the sectors that depend on it. The decision also recognizes EcoWaste’s plans to build a new, modern facility that recycles 65% of the waste it receives and supports a sustainable circular economy that reduces waste and creates economic opportunity for British Columbians.

The Ministry of Environment and Climate Change, who oversee and authorize the landfill under the Environmental Management Act, as well as the ALC have both been consulted and agree with the decision to remove the land from the ALR.

#### **Quick Facts:**

- Ecowaste has operated in Richmond since 1971 and is one of three Municipal Solid Waste landfills in the lower mainland.
- Ecowaste is a Canadian-owned company, that operates a 160-hectare landfill for the disposal and recycling of 320,000 tonnes of construction, demolition and excavation materials annually.
- The removal of the industrial landfill from the ALR was completed by Order in Council, [link here](#)

#### **Contact:**

Dave Townsend  
Government Communications and Public Engagement  
Ministry of Agriculture and Food  
250 356-7098  
250 889-5945 (mobile)

Page 074 of 112 to/à Page 075 of 112

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s.13

Page 076 of 112 to/à Page 077 of 112

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s.12 ; s.14

Page 078 of 112 to/à Page 082 of 112

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s.12 ; s.13



Page 083 of 112

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s.12 ; s.13 ; s.14 ; s.16

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s.12 ; s.13

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s.12 ; s.13 ; s.14 ; s.16

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s.12 ; s.13 ; s.14

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s.12 ; s.13

Page 092 of 112 to/à Page 093 of 112

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s.12 ; s.13 ; s.14

Page 094 of 112 to/à Page 098 of 112

Withheld pursuant to/removed as

s.12 ; s.13





## City of Richmond

Malcolm D. Brodie  
Mayor

6911 No. 3 Road  
Richmond, BC V6Y 2C1  
Telephone: 604-276-4123  
Fax No: 604-276-4332  
www.richmond.ca

June 22, 2022

Hon. George Heyman  
Minister of Environment and  
Climate Change Strategy  
Room 112 Parliament Buildings  
Victoria, BC V8V 1X4

✓ Hon. Lana Popham  
Minister of Agriculture and  
Food  
PO Box 9043 Stn Prov Govt  
Victoria, BC V8W 9E2

Dear Ministers, 

**Re: MONTROSE INDUSTRIES LTD. (ECOWASTE) DESIGN, OPERATIONS AND CLOSURE PLAN SUBMISSION BY MONTROSE INDUSTRIES LTD. TO THE MINISTRY OF ENVIRONMENT**

This is to advise that Richmond City Council at its Council meeting held on June 13, 2022, considered the above matter and adopted the following resolution:

*That the Mayor, on behalf of City Council, will sign and submit a letter to the Minister of Environment, Minister of Agriculture and local Members of Legislative Assembly (MLA's) indicating that the Design, Operations and Closure Plan submitted by Montrose Industries Ltd. to the Ministry of Environment in February 2022 is inconsistent with the Operational Certificate for the landfill and City Council and Agricultural Land Commission approvals granted to date, and should therefore be set aside or rejected.*

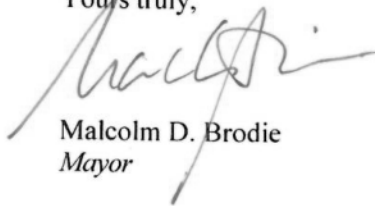
On behalf of Richmond City Council, the purpose of this letter is to request the Design, Operations and Closure Plan (DOCP) submitted by Montrose Industries Ltd. in February 2022 to the Ministry of Environment (MOE) be set aside or rejected.

Montrose Industries Ltd., previously known as Ecowaste Industries Ltd., operates a landfill at 7011 No. 7 Road & PID 024-397-423 located within the Agricultural Land Reserve (ALR) and subject to the *Agricultural Land Commission Act* (ALCA). It has come to our attention that Montrose Industries Ltd. submitted a DOCP to MOE in February 2022 that is inconsistent with the Operational Certificate for the landfill, and City Council and Agricultural Land Commission (ALC) approvals granted to date. The applicant did not consult the City during the preparation of the DOCP.

The Operational Certificate issued by MOE for the landfill indicates that the holder must ensure the activities identified in the DOCP are carried out with regard to the rights of third parties, and comply with other applicable legislation that may be in force. Current City Council and ALC approvals for the landfill (Resolutions #384/2015, #385/2015, #504/2020) include a maximum elevation of 18 m and a term until 2035. The DOCP submitted to MOE in February 2022 indicates a maximum elevation of 28 m and a term until 2060. This is inconsistent with current City Council and ALC approvals and it is requested that the DOCP be set aside or rejected until this matter is resolved.

We welcome the opportunity to discuss this matter with you in further detail and respond to any questions you may have. To make these arrangements, please contact my Executive Assistant, Gillian Baker, at 604-276-4242 or [GBaker@richmond.ca](mailto:GBaker@richmond.ca).

Yours truly,

A handwritten signature in black ink, appearing to read 'Malcolm D. Brodie', is written over the typed name and title.

Malcolm D. Brodie  
*Mayor*

## **Question: Mayor M. Brodie - City of Richmond - Montrose Industries**

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From: Correspondence Unit ENV:EX <Correspondence.Unit@gov.bc.ca>  
To: Correspondence Unit AF:EX <MCU@gov.bc.ca>  
Cc: Correspondence Unit ENV:EX <Correspondence.Unit@gov.bc.ca>  
Sent: July 25, 2022 1:41:09 PM PDT  
Attachments: Mayor M. Brodie - City of Richmond - Montrose Industries.pdf  
Hi Jena:

Both of our ministers received the attached letter from the City of Richmond regarding Montrose Industries Ltd.'s Design, Operations and Closure Plan (DOCP). The DOCP was submitted to ENV earlier this year and ENV staff have drafted a response under Minister Heyman's signature (ENV 391056).

I can see that Minister Popham's letter is logged in your CLIFF 198267 and is currently with your MO "under review."  
Should ENV respond obo Minister Popham when we send out Minister Heyman's reply?

-  
Cheers,  
**Diana Ainsworth** (she/her)  
Correspondence Analyst, Correspondence Unit  
Ministry of Environment and Climate Change Strategy  
778-974-4385



City of  
Richmond

June 22, 2022

<b>MINISTER'S OFFICE – RECEIVED</b>		<b>Malcolm D. Brodie</b>	
<b>MINISTRY OF ENVIRONMENT</b>		<b>Mayor</b>	
<b>JUL 05 2022</b>		6911 No. 3 Road Richmond, BC V6Y 2C1 Telephone: 604-276-4123 Fax No: 604-276-4332 www.richmond.ca	
<input type="checkbox"/> Min Reply	<input type="checkbox"/> Reply Direct	<input type="checkbox"/> DM Reply	<input type="checkbox"/> Info/File
<input type="checkbox"/> Send Interim	<input type="checkbox"/> Redirect to		
<input type="checkbox"/> CC:			
<input checked="" type="checkbox"/> CLIFF			

✓ Hon. George Heyman  
Minister of Environment and  
Climate Change Strategy  
Room 112 Parliament Buildings  
Victoria, BC V8V 1X4

Hon. Lana Popham  
Minister of Agriculture and  
Food  
PO Box 9043 Stn Prov Govt  
Victoria, BC V8W 9E2

George  
Dear Ministers,

**Re: MONTROSE INDUSTRIES LTD. (ECOWASTE) DESIGN, OPERATIONS AND CLOSURE PLAN SUBMISSION BY MONTROSE INDUSTRIES LTD. TO THE MINISTRY OF ENVIRONMENT**

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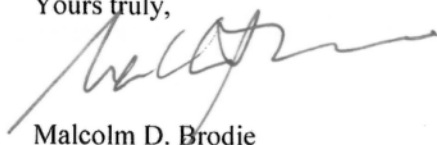
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We welcome the opportunity to discuss this matter with you in further detail and respond to any questions you may have. To make these arrangements, please contact my Executive Assistant, Gillian Baker, at 604-276-4242 or [GBaker@richmond.ca](mailto:GBaker@richmond.ca).

Yours truly,



Malcolm D. Brodie  
Mayor



Office of the Mayor  
City of Richmond  
6911 No. 3 Road  
Richmond, BC V6Y 2C1



Hon. George Heyman  
Minister of Environment and  
Climate Change Strategy  
Room 112 Parliament Buildings  
Victoria, BC V8V IX4



## **RE: Montrose Industries Ltd. Design, Operations and Closure Plan**

---

From: Minister, ENV ENV:EX <ENV.Minister@gov.bc.ca>  
To: mayorandcouncillors@richmond.ca  
Cc: Minister, AF AF:EX <AF.Minister@gov.bc.ca>  
Sent: August 5, 2022 4:14:32 PM PDT  
Attachments: 391056.pdf  
Reference: 391056

*August 5, 2022*

His Worship Mayor Malcolm D. Brodie  
and Councillors  
City of Richmond  
6911 No. 3 Road  
Richmond BC V6Y 2C1

Sent via email: mayorandcouncillors@richmond.ca

Dear Mayor Brodie and Council:

Please see the attached letter from the Honourable George Heyman, Minister of Environment and Climate Change Strategy. A hard copy will not follow by mail.



Reference: 391056

*August 5, 2022*

His Worship Mayor Malcolm D. Brodie  
and Councillors  
City of Richmond  
6911 No. 3 Road  
Richmond BC V6Y 2C1

Sent via email: [mayorandcouncillors@richmond.ca](mailto:mayorandcouncillors@richmond.ca)

Dear Mayor Brodie and Council:

Thank you for your letter of June 22, 2022, which was also addressed to my colleague, the Honourable Lana Popham, Minister of Agriculture and Food, regarding Montrose Industries Ltd.'s Design, Operations and Closure Plan (DOCP). As your enquiry falls under the jurisdiction of the Ministry of Environment and Climate Change Strategy (ENV), I am pleased to respond.

You have requested that the DOCP submitted to my ministry earlier this year be rejected or set aside because of inconsistencies with the Operational Certificate conditions. Your letter also notes that the maximum elevation and lifespan of the landfill as proposed in the DOCP exceeds what is set out in City of Richmond and Agricultural Land Commission approvals. I understand that Montrose Industries is working directly with the City of Richmond towards resolution of these issues.

The ministry review of the DOCP is not complete. Additional assessment and consultation is needed before a decision on the DOCP can be made. As part of the review, ministry staff intend to consult with the City of Richmond regarding the concerns raised in your letter. In the interim, before a decision on the DOCP is made, the current Operational Certificate requirements will prevail over anything in the DOCP that is inconsistent with the Operational Certificate.

I trust this addresses your most immediate concerns; if this is not the case, please let me know. You may also wish to contact ministry staff directly. Cassandra Caunce is the Director of South Authorizations, and this file is managed by her team. She can be reached by email at [Cassandra.Caunce@gov.bc.ca](mailto:Cassandra.Caunce@gov.bc.ca).

Thank you for again for taking the time to write and let us know of this issue.

Sincerely,

George Heyman  
Minister

cc: Honourable Lana Popham, Minister of Agriculture and Food

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Ministry of Environment and  
Climate Change Strategy

Office of the  
Minister

Mailing Address:  
Parliament Buildings  
Victoria BC V8V 1X4

Telephone: 250 387-1187  
Facsimile: 250 387-1356  
Website: [www.gov.bc.ca/env](http://www.gov.bc.ca/env)



## Question: Mayor M. Brodie - City of Richmond - Agricultural Land Reserve Exclusion Application

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From: Ainsworth, Diana ENV:EX <Diana.Ainsworth@gov.bc.ca>  
To: Correspondence Unit AF:EX <MCU@gov.bc.ca>  
Sent: August 16, 2022 11:59:47 AM PDT  
Attachments: Mayor M. Brodie - City of Richmond - Agricultural Land Reserve Exclusion Application.pdf

Hi Jena:

Both of our ministers received the attached letter (of July 27/22) from the City of Richmond regarding the Agricultural Land Reserve Exclusion Application by Montrose Industries. Although the previous letter from Richmond on this topic was responded to by Minister Heyman, ENV program staff have reviewed the attached letter and recommended that Minister Popham respond to this one in particular. (If I'm reading the letter correctly, it seems Richmond is now asking government to allow the facility to stay there in the ALR.)

Can you confirm if AF is responding to the letter? If so, please cc Minister Heyman.

Cheers,

**Diana Ainsworth** (she/her)

Correspondence Analyst, Correspondence Unit  
Ministry of Environment and Climate Change Strategy  
778-974-4385



City of  
Richmond

July 27, 2022

**MINISTER'S OFFICE – RECEIVED  
MINISTRY OF ENVIRONMENT**

Malcolm D. Brodie  
Mayor

AUG 11 2022

☐ Min Reply ☐ Reply Direct ☐ Ltr Reply ☐ Info/F  
☐ Send Interim ☐ Redirect to  
☐ CC:   
CLIFF

6911 No. 3 Road  
Richmond, BC V6Y 2C1  
Telephone: 604-276-4123  
Fax No: 604-276-4332  
www.richmond.ca

Hon. George Heyman  
Minister of Environment and  
Climate Change Strategy  
Room 112 Parliament Buildings  
Victoria, BC V8V 1X4

Hon. Lana Popham  
Minister of Agriculture and  
Food  
PO Box 9043 Stn Prov Govt  
Victoria, BC V8W 9E2

Dear Ministers,

**Re: Agricultural Land Reserve Exclusion Application by Montrose Industries Ltd. at  
7011 No. 7 Road & PID 024-397-423**

This is to advise that Richmond City Council, at its Council meeting held on July 25, 2022, considered the above matter and adopted the following resolution:

- (1) *That authorization for Montrose Industries Ltd. to forward an Exclusion Application to the Agricultural Land Commission for removal of 7011 No. 7 Road & PID 024-397-423 from the Agricultural Land Reserve (ALR) be denied.*
- (2) *That staff be directed to prepare a letter signed by the Mayor to the Minister of Agriculture, Minister of Environment, Richmond Members of Legislative Assembly (MLAs) and the Premier of BC requesting the Provincial Government consider all options to allow the existing landfill at the site to operate in the ALR under a non-farm use approval.*

On behalf of Richmond City Council, the purpose of this letter is to request the Provincial Government to consider all options to allow the existing landfill at 7011 No. 7 Road & PID 024-397-423 to operate in the Agricultural Land Reserve (ALR) under a non-farm use approval. Previous letters from Richmond City Council related to this matter were delivered to the Province (dated March 2, 2021, November 3, 2021 & June 22, 2022).

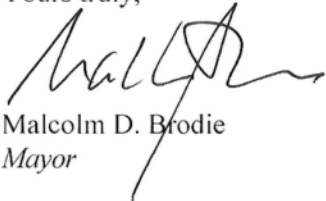
Montrose Industries Ltd., previously known as Ecowaste Industries Ltd., operates a landfill at 7011 No. 7 Road & PID 024-397-423 located within the ALR and subject to the *Agricultural Land Commission Act* (ALCA). The landfill has been permitted to operate within the ALR under non-farm use approvals by City Council and the Agricultural Land Commission (ALC), which require the site to be remediated to a state capable of soil-based agriculture upon closure of the landfill.

Due to the passage of Bill 52, which prohibited construction waste debris as permitted fill within the ALR, landfills can no longer be considered via a non-farm use application. Although the City recognizes the intent of this legislation, the City does not believe this legislation should apply to existing authorized landfill sites in the ALR prior to the adoption of this Bill.

It is requested that the Province review Bill 52 and consider all options to allow the landfill to operate in the ALR under a non-farm use application subject to City Council and ALC approval. This would allow the landfill to continue to operate under conditions acceptable to City Council and the ALC, maintain the current ALR boundary and ensure the land can be used for soil-based agriculture once the landfill is decommissioned, consistent with ALR objectives and City Council policy.

We welcome the opportunity to discuss this matter with you in further detail and respond to any questions you may have. To make these arrangements, please contact my Executive Assistant, Gillian Baker, at 604-276-4242 or [GBaker@richmond.ca](mailto:GBaker@richmond.ca).

Yours truly,

A handwritten signature in black ink, appearing to read 'Malcolm D. Brodie', with a stylized flourish at the end.

Malcolm D. Brodie  
*Mayor*



Office of the Mayor  
City of Richmond  
6911 No. 3 Road  
Richmond, BC V6Y 2C1



PE0315169642  
000429 9JYV6  
0808 092345



HON. GEORGE HEYMAN  
MINISTER OF ENVIRONMENT AND CLIMATE  
CHANGE STRATEGY  
ROOM 112 PARLIAMENT BUILDINGS  
VICTORIA, BC V8V 1X4



## 198546 Letter from Minister Popham

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From: Ryan.Chew@gov.bc.ca  
To: mayorandcouncillors@richmond.ca  
Cc: OfficeofthePremier, Office PREM:EX <Premier@gov.bc.ca>, Minister, ENV  
ENV:EX <ENV.Minister@gov.bc.ca>  
Sent: September 1, 2022 2:31:17 PM PDT  
Attachments: 198546 Letter from Minister Popham.pdf

Good Afternoon,

Please see the attached letter from the Minister of Agriculture and Food, Lana Popham.

**Kindest Regards,**

**Office of the Minister of Agriculture and Food**

Email: [AF.Minister@gov.bc.ca](mailto:AF.Minister@gov.bc.ca) | Phone: (250) 387-1023



September 1<sup>st</sup>, 2022

File: 0280-30

Ref: 198546

His Worship Mayor Malcolm D. Brodie  
and Councilors  
City of Richmond  
6911 No. 3 Road  
Richmond, BC V6Y 2C1  
Email: [mayorandcouncillors@richmond.ca](mailto:mayorandcouncillors@richmond.ca)

Dear Mayor Brodie and Council:

Thank you for your letter of July 27, 2022, which was also addressed to the Honourable John Horgan, Premier, and the Honourable George Heyman, Minister of Environment and Climate Change Strategy, regarding the Ecowaste/Montrose landfill. As Minister of Agriculture and Food, I am pleased to respond on behalf of my colleagues.

I appreciate the information and advice you provided on the Ecowaste/Montrose landfill. The Ministry of Agriculture and Food will consider this information in our evaluation. The Government is currently exploring a range of options for this landfill, and its decision-making process is ongoing; a decision on this issue is not imminent. Ministry staff will continue to meet with members of city staff to discuss this issue.

Sincerely,

Lana Popham  
Minister

cc: Honourable John Horgan  
Premier

Honourable George Heyman  
Minister of Environment and Climate Change Strategy