



The ministry will be revising the Organic Matter Recycling Regulation (OMRR)

September 2018

The September 2018 intentions paper (IP) is the result of policy elaboration and development following three previous policy intentions papers (October 2006, July 2011 and October 2016) with consultations, a follow up Summary of Public Input and Policy Update (March 2017), and policy work completed this past year by the Ministry of Environment and Climate Change Strategy (the ministry).

The IP builds on areas for review that were identified in the 2016 policy intentions paper and the 2017 Summary of Public Input and Policy Update, with specific updated information addressing:

- Opportunities for increased public transparency;
- Additional requirements for notification, including with local government;
- Requirements for engagement with First Nations; and
- Requirements for discharge authorization.

The questions in this response form follow the sequence and structure of the Intentions Paper (fillable boxes are available for each question). Comments on the ministry's intentions are welcomed, using this response form or via a separate submission. All submissions and comments will be reviewed and considered by the ministry in moving forward with the proposed updates to the regulation. As well, all submissions will be reviewed for inclusion without attribution in a consultation summary report to be made public following the consultation period.

The ministry expects to amend and implement the revised regulation in 2019. A training and implementation period for the revised regulation will follow.

The ministry welcomes comments on the information and proposals outlined in the intentions paper posted on the ministry's website:

<https://www2.gov.bc.ca/gov/content/environment/waste-management/food-and-organic-waste/regulations-guidelines>

Those interested are invited to submit comments to the ministry using this form, or by separate submission if desired, by email to env.omrr.reg.reviews@gov.bc.ca or print and send by mail to:

BC Ministry of Environment and Climate Change Strategy – OMRR Review
PO Box 9341 Stn Prov Govt
Victoria, BC V8W 9M1

Responses received by **November 8, 2018** will be considered by the ministry in preparing the proposed revisions to the regulation.

If you have any questions or comments please email: env.omrr.reg.reviews@gov.bc.ca

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Background Information

Q: Do you have any general comments on the Background Information, including the following sections: Managing and Recycling of Organic Matter; Ministry Service Plan Targets; Provincial Review of the Professional Reliance Model; Province of British Columbia's Relationship with Indigenous Peoples; or Canada-wide Approach for the Management of Wastewater Biosolids? (IP pages 4-7)

We would like to emphasize the importance of using biosolids beneficially; diverting this resource from the landfill; keeping costs manageable; protecting the environment; and improving odour controls and the regulatory framework around the management of composting facilities.

1 Authorization Process Under the OMRR

The proposed changes will enhance regulatory requirements applicable to improving government authority, notification and information submission, and to support engagement with First Nations, by introducing a **registration process** under OMRR. In addition, the ministry is proposing to introduce a **notification process** for authorization of some activities under OMRR.

Q1.a: Do you have any general comments on the proposed change to a **registration process**? (IP page 8)

Support for a registration process that maintains a clear and reasonable evaluation period for the Ministry (e.g. 30 days as is currently in place for notifications) to enable efficient planning and allow for the continuation of existing Land Application Plans without administrative delays that may increase the risk of biosolids being sent to the landfill.

See more comments in Q1.3

Q1.b: Do you have any comments on a requirement to give notice for biosolids growing medium facilities using 5 m³ or more of biosolids at a site per calendar year? (IP page 8)

no comment

Q1.c: Do you have any comments on **Table 1: Overview of proposed authorization processes under the OMRR?** (IP page 9)

A composting facility accepting under 15,000 wet tonnes/year of feedstock still has the potential to cause significant environmental impact and odour problems in a community. Consider lowering the threshold for permitting composting facilities processing food or putrescible waste to 5,000 tonnes/year of feedstock.

1.1 Composting facilities thresholds; waste management plans

The ministry is proposing to replace requirements in the OMRR based on the amount of compost produced with requirements based on the amount of feedstock received by a composting facility.

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Q1.1a: Do you have any comments on basing composting facilities requirements on total annual mass of **feedstock received**? (IP page 10)

Support basing thresholds on quantity of feedstock as compared to design or finished compost.

Q1.1b: Do you have any comments on making registration **documents available online to the public**? (IP page 9)

Support for increased transparency

1.2 Registration of composting facilities

The ministry is proposing to require submission of a registration form as part of the registration process

Q1.2a: Do you have any comments on the **requirement to give notice of operation being replaced with a registration process for all composting facilities (that do not require a permit, approval or operational certificate)**? (IP page 10)

Support for a registration process.

Q1.2b: Do you have any comments on the proposed information to be included in the **registration form**? (IP page 11 - sidebar)

no comment

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1.2.1 Registration process for composting facilities

The ministry is proposing to require submission of a registration form as part of the registration process.

Q1.2.1a: Do you have any comments on the **registration process?** (IP page 11)

no comment

Q1.2.1b: Do you have any comments on the proposed **timeframe for existing compost facilities?** (IP page 11)

no comment

1.2.2 Notification of changes to registration

Q1.2.2: Do you have any comments on the **proposed requirements to notify authorities** regarding changes to registration? (IP page 12)

no comment

1.3 Registration of land application of managed organic matter

The ministry is proposing that the requirement to give notification in writing will be replaced by a registration process for land application of managed organic matter.

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Q1.3: Do you have any general comments on the **proposed registration for land application** of managed organic matter? (IP page 13)

Section 1.3 says the registration process would apply to land application of organic matter as soon as the revised regulation comes into effect and that existing notifications would be left as is until expiration. While we support leaving notifications in place until expiration, it is our experience that LAPs (and associated notification) must be renewed annually. So, depending on when the new regulation comes into force, it appears that existing biosolids land application operations will have 0-12 months to complete the registration process. It also appears that the pre-registration and registration process is likely to take 3+ months to complete. Disrupting the continuity of the LAP would increase the risk of biosolids being sent to the landfill. Allowing a minimum of 1 year for existing land application operations to become registered (existing composting facilities are given 2 years according to Section 1.2) would likely provide sufficient time to complete the registration process and minimize the risk of biosolids being unnecessarily sent to the landfill.

Support for a registration process that maintains a clear and reasonable evaluation period for the Ministry (e.g. 30 days as is currently in place for notifications) to enable efficient planning and allow for the continuation of existing Land Application Plans without administrative delays that may increase the risk of biosolids being sent to the landfill.

Supports for multiple-year registrations of up to 5 years in length.
Recommend that Land Application Renewal does not require notification.

Propose to simplify the registration process by defining only the landowner or lease-holder as the discharger and listing proposed biosolids generators separately.

1.3.1 Registration process for land application of managed organic matter

The ministry is proposing to require submission of a registration form as part of the registration process.

Q1.3.1a: Do you have any comments on the proposed **submission requirements**? (IP page 13)

Support for the proposed submission requirements.

Q1.3.1b: Do you have any comments on the proposed information to be included in the **registration form**? (IP page 14 – side bar)

Support for requesting information in the registration form that is not likely to change over the period of the registration (e.g., biosolids generator, land type, but not material quality) in order to reduce the requirement for Change Notifications.

Support reducing duplication of information between separate documents which form part of the submission in order to streamline information.

Q1.3.1c: Do you have any comments on the requirements for **pre-registration engagement and notification**? (IP page 14)

Support for increased information sharing with First Nations. Request clear pre-registration criteria.

1.3.2 Notification of changes to registration

Q1.3.2: Do you have any comments on the proposed **requirements to notify authorities** regarding changes to registration? (IP page 14)

Propose that only information contained on the registration form be subject to a requirement of notification in the event of change. Other factors which may change more frequently should not be subject to this requirement as this will likely require numerous change notifications and burden the process.

1.4 Notification requirement for biosolids growing medium facilities

The ministry intends that the requirement to give notice in writing under OMRR will apply to biosolids growing medium (BGM) facilities.

Q1.4a: Do you have any comments on the proposed amendment of the definition of “**discharger**”? (IP page 15)

no comment

Q1.4b: Do you have any comments on the **proposed notification requirements** for existing biosolids growing medium facilities to come into compliance with requirements? (IP page 16)

no comment

Q1.4c: Do you have any comments on the **proposed timeframe** or making notification **documents available online to the public**? (IP page 17)

Support for increased transparency

2 *Engagement with First Nations*

The ministry received feedback from stakeholders and First Nations indicating that there is a need for increased transparency around composted matter, composting facilities, biosolids growing medium facilities and land application.

Q2a: Do you have any comments on the ministry's intention to amend the regulation to **support the draft principles**? (IP page 17)

Support the intention to amend the regulation to support the draft principles.

Q2b: Do you have any comments on the pre-registration and notification requirements? (IP page 17)

Support for increased information sharing with First Nations. Request clear pre-registration criteria.

3 *Substitutions under the OMRR*

The ministry is proposing that an applicant may apply for a substitution by completing a form; or, a director may on his or her own initiative substitute a different requirement for a requirement contained in the regulation.

Q3: Do you have any comments on the proposed **changes for substitutions**? (IP page 18)

Support the addition of a substitution process to provide flexibility in meeting the intent of the regulation.

4 Fee Payments

The ministry is proposing to introduce fee payment requirements for registrations, substitutions, and annual fees as summarized in Table 2.

Q4: Do you have any comments on the proposed **fee payments** as outlined in Table 2? (IP page 20)

Suggest that fees for a substitution be based on the lesser of the hourly fees or a flat fee, whichever is less. This would increase transparency and allow for better budgeting.

5 Organic Matter Suitable for Composting

The ministry is seeking comments regarding potential definitions and inclusion of the following organic materials in Schedule 12.

5.1 Untreated and unprocessed wood

The ministry intends to amend Column 1 and 2 of the table in Schedule 12 for untreated and unprocessed wood.

Q5.1: Do you have any comments on the proposed amendments to Schedule 12 for **untreated and unprocessed wood**? (IP page 21)

no comment

5.2 Domestic composting toilet sludge; domestic wastewater treatment plant sludge

The ministry intends to amend Schedule 12 of the OMRR to include *domestic composting toilet sludge* as “sludge removed from a composting toilet used for receiving and treating domestic sewage.”

Q5.2: Do you have any comments on the proposed amendments to include the broader category of domestic wastewater treatment plant sludge in Schedule 12? (IP page 22)

no comment

5.3 Non-recyclable paper material

At present the OMRR does not contain provisions for composting of “*non-recyclable paper material*.” The ministry intends to amend Schedule 12 of the OMRR to include *non-recyclable paper material*.

Q5.3: Do you have any comments on the proposed addition of “*non-recyclable paper material*” and its definition to Schedule 12 of the OMRR? (IP page 21)

The addition of non-recyclable paper to the list of acceptable feedstocks is supported.

5.4 Compostable plastic

The ministry intends to amend Schedule 12 of the OMRR to include “*compostable plastic*.”

Q5.4: Do you have any comments on the proposed addition of “*compostable plastic*” to Schedule 12 of the OMRR? (IP page 21)

The addition of compostable plastic to the list of acceptable feedstocks is supported.

5.5 Used mushroom growing substrate

The ministry intends to categorize “*used mushroom growing substrate*” as organic matter suitable for composting.

Q5.5: Do you have any comments on enabling “*used mushroom growing substrate*” to be categorized as organic matter suitable for composting? (IP page 22)

no comment

6 Composting Facilities

The ministry is proposing to address standards, practices and expectations of composting facilities through broadened facility planning requirements, requirements for best achievable technologies at facilities, added setback requirements and updated expectations for compost quality and safety.

6.1 Facility environmental management plan

The ministry is proposing to consolidate and amend current OMRR composting facility planning requirements, and specify odour management plan provisions in the regulation.

Q6.1a: Do you have any comments on the ministry's requirement for all composting facilities to prepare a "facility environmental management plan" (FEMP)? (IP page 24)

Agree with the principal to allow small composting facilities that are less likely to cause environmental or odour problems to set up through a less rigorous and more expedient process; and require large facilities to be developed to best achievable technology standard. However, the thresholds may not promote the desired result.

The 15,000 tonnes/year threshold for a full facility management plan may trigger facilities to limit feedstock to 14,999 tonnes/year or run multiple composting businesses on the same site to avoid the more rigorous permitting process.

The threshold for a "full" Facility Environmental Management Plan should be lower.

Q6.1b: Do you have any comments on the proposed FEMP requirements? (IP page 24 – Table 3)

No comments

Q6.1c: Do you have any comments on enabling a director to request additional information? (IP page 24)

Support enabling a director to request additional information

6.2 *Best practices*

The ministry is proposing to revise the OMRR to include specific provisions related to BMPs and BAT at composting facilities.

Q6.2a: Do you have any comments on the ministry's intention to include specific provisions related to BMPs and BAT at composting facilities.? (IP page 25)

Support for including provisions for BMPs and BAT at composting facilities.

Q6.2b: Do you have any comments on the ministry's intention to establish phased-in requirements for updated **standards and practices**? (IP page 25)

It is unclear why new facilities, particularly those managing food or putrescible waste, will have 5 years to compost in-vessel or contain facilities within enclosed structures. New facilities should meet the requirement immediately.

A 10-year time frame for existing facilities seems excessive. Recommend a 5-year time frame. A Director could give a longer grace period where it is justified.

Many existing facilities that do not meet this standard have had significant odour problems. It does not seem reasonable to set timelines that might allow odors to persist for a decade.

6.3 *Compost quality criteria and safety*

The ministry is proposing to update standards that apply to organic matter suitable for composting under the OMRR.

Q6.3a: Do you have any comments on the ministry's proposed standards for organic matter suitable for composting? (IP page 26)

Support the amendment to the proposed standards.

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Q6.3b: Do you have any comments on the ministry's intent to **harmonize the OMRR** with other national standards and federal regulations? (IP page 27)

no comment

Q6.3c: Do you have any comments on the ministry's intent to include less rigorous provisions for **facilities processing only yard waste**? (IP page 27)

no comment

6.4 *Setbacks*

At present, the OMRR includes setback requirements for the land application of Class B biosolids and Class B compost, but mandatory buffers or setbacks are not specified in the regulation for siting of composting facilities.

Q6.4: Do you have any comments on **mandatory setbacks**? (IP page 27)

Support for moving setbacks from the guidelines to the regulation.

7 Land Application and Distribution of Organic Matter

7.1 Updates to quality criteria

The ministry is proposing to update standards contained in the OMRR.

Q7.1a: Do you have any comments on updating standards contained in the OMRR? (IP page 28)

Support for adding standards for copper and chromium for Class A biosolids. Propose that the current copper limit of 2,200 mg/kg be kept in order to allow management of biosolids without the need for a substitution.

Q7.1b: Do you have any comments on the ministry's proposal to update Section 2 of Schedule 4? (IP page 28)

Support for the intention of these changes. Propose that the Ministry define how foreign matter and plastics concentration would be analysed as these are not currently described in the BC laboratory manual.

Q7.1c: Do you have any comments on the ministry's proposal to enable a director to request sampling of biosolids for some CECs? (IP page 29)

Support a request for sampling CECs on a case-by-case basis. Consideration should be given to the cost required to undertake analysis of the suite of CECs proposed. We emphasize the importance of keeping costs manageable and predictable.

Guidance should be available on the sampling and analysis of CECs to enable standardization of methodology and consistency in interpreting results.

Caution that there is a risk of misinterpretation if CEC data are posted online without regulatory thresholds.

7.2 Labeling and disclosure

The ministry is proposing to increase transparency around land application and labelling of organic matter by requiring additional information disclosure related to biosolids.

Q7.2: Do you have any comments on this **additional information disclosure**? (IP page 29)

Support increased transparency around land application and labeling

7.3 *Best practices for land application*

The ministry intends to amend the OMRR to include BMPs that are currently in guidance, so that they are clarified in the regulation. The ministry proposes to increase clarity around agronomic requirements and land application.

Q7.3a: Do you have any general comments on the proposed amendments to increase clarity? (IP page 29)

Support for updating and clarifying best management practices for biosolids management. We propose that the conditions under which a biosolids land application site be deemed a contaminated site be defined clearly. We propose that the OMRR specify requirements for land application of managed organic matter in soil-building contexts such as landfill closure or mine reclamation where the application rate may exceed strict crop requirement for the purpose of building soil. In such contexts the regulation could require rationale for an application rate in excess of the agronomic rate, an assessment of nutrient availability and fate, and a monitoring plan. For example, if Class B biosolids are mixed with mineral soil and woodwaste and applied as a fabricated soil 50 cm deep, the objective to build a soil justifies the high rate, biosolids nutrients will be taken up both by site vegetation and by decomposition of the wood waste, and surface/groundwater will be monitored to assess nutrient runoff.

Q7.3b: Do you have any comments on the **proposed minimum setbacks** for Class A biosolids? (IP page 30)

Support proposed minimum setbacks for Class A biosolids

Q7.3c: Do you have any comments on the proposed **waiting periods** for Class A biosolids? (IP page 30)

Support proposed minimum waiting periods for Class A biosolids

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Q7.3d: Do you have any comments on the ministry's intent to align with the Agricultural Waste Control Regulation for field storage requirements? (IP page 31)

no comment

7.4 Compliance

The ministry intends to revise the regulation to require that proponents must be in compliance with their land application plans. The ministry also intends to amend the OMRR to specify that land application plans include a contingency plan.

Q7.4: Do you have any comments on the proposed amendments to the OMRR regarding compliance with land application plans? (IP page 31)

no comments

7.5 Mine site reclamations and landfill closures

The ministry has further advanced the intention to support reclamation at mine sites, and is now proposing to enable a registration process for mine sites, landfill closures, or other specific sites as described in the IP.

Q7.5: Do you have any comments on this section? (IP page 32)

no comments

8 *Sampling, Monitoring and Record Keeping*

Q8: Do you have any comments on the **general provision** to be included in the regulation and applied to all sampling? (IP page 33)

no comment

8.1 *Sampling and Monitoring of managed and retail grade organic matter*

The ministry is proposing revisions to sampling and monitoring of the finished product, and aligning the sampling methodology for Class A and Class B biosolids, and Class A and Class B compost and biosolids growing medium.

Q8.1a: Do you have any comments regarding the proposed **revisions to sampling and monitoring requirements**? (IP page 33)

Recommend that requirement for screening is waived if biosolids meet the quality for foreign matter. Our biosolids undergo settling and screening at the wastewater treatment plant and screening would increase the cost of management and may not produce an improved product.

Currently, fecal coliform sampling is done at the wastewater treatment plant on the rationale that we want to confirm whether the wastewater treatment plant is achieving process requirements. Also, if we had to sample at the biosolids stockpile (several kilometers away) and quality parameters weren't met, we would have to remove the biosolids and take it to the landfill, resulting in double handling (that we do not have contract services for).

Q8.1b: Do you have any comments on the ministry's proposal to clarify the intended sampling and monitoring requirements applicable to **pathogen limits** in finished product? (IP page 33)

Request clarification of the rationale for fecal coliform sampling within 2 months prior to land application. We propose that instead of the proposed sampling requirement, the OMRR contain a requirement that prior to land application, samples which are representative of the biosolids to be land-applied be analysed for fecal coliforms. The Ministry should clarify what the point of sampling biosolids at the land application site prior to land application is.

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Q8.1c: Do you have any comments regarding the proposed amendments to Schedule 5 of the OMRR? (IP page 34)

Propose requirement for screening is waived if biosolids meet the quality for foreign matter. Our biosolids undergo settling and screening at the wastewater treatment plant and screening would increase the cost of management and may not produce an improved product.

Q8.1d: Do you have any comments on the intention to clarify the requirement for sampling and monitoring of biosolids growing medium? (IP page 34)

no comment

8.2 Soil sampling and monitoring at land application sites

The proposed regulatory revisions would introduce requirements for sampling and monitoring to be conducted at land application sites.

Q8.2a: Do you have any comments on the proposed requirements for **soil sampling and monitoring** at land application sites? (IP page 35)

Please clarify the matrix for proposed sampling requirements (i.e., soil or biosolids).

Please explain the benefit of sampling biosolids at the land application site prior to land application.

Q8.2b: Do you have any comments on the ministry's proposal to enable a director to request post-application sampling? (IP page 34)

Support for post-application sampling with a clear rationale. Consideration should be given to the cost required to undertake the analysis of samples. We emphasize the importance of keeping costs manageable.

It should be noted in the regulation that the timeline must be a minimum of 6 months post-application to enable the soil and biosolids to suitably mix together.

Q8.2c: Do you have any comments on the proposed sampling and analysis of **contaminants of emerging concern**? (IP page 35)

Support sampling for CECs on a case-by-case basis at the request of a Director. Guidance should be available on the sampling and analysis of CECs to enable standardization of methodology and consistency in interpreting results. Consideration should be given to the cost required to undertake analysis of the suite of CECs proposed. We emphasize the importance of keeping costs manageable.

8.3 Record keeping

The ministry is proposing to change the current record keeping requirement in the OMRR.

Q8.3a: Do you have any comments on the change in **recordkeeping** requirement? (IP page 35)

Support for changes to recordkeeping requirements

Q8.3b: Do you have any comments on the ministry's intent to post all **documentation online**? (IP page 35)

Support for increased transparency

9 Updates to Technical Standards

9.1 Consistency of schedules with other national and provincial standards and regulations

The proposed amendments to the OMRR will ensure that the technical standards in the OMRR are consistent with current national standards and federal regulations.

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Q9.1: Do you have any comments on the ministry’s proposal to update the OMRR to ensure consistency with CCME standards and federal regulations? (IP page 36)

no comment

9.2 Consistency with the Contaminated Sites Regulation (CSR)

The ministry is proposing to maintain the current flexibility in the OMRR that enables proponents to develop site-specific soil standards using protocols approved by the director.

Q9.2: Do you have questions regarding this topic? (IP page 36)

no comment

9.3 Consistency with the Agricultural Waste Control Regulation (AWCR)

The ministry will ensure that the OMRR and the Agricultural Waste Control Regulation (currently under review) are aligned to ensure consistency between regulations.

Q9.3: Do you have questions regarding this topic? (IP page 37)

The RDN supports an alignment between these two regulations and the creation of guidance documents for nutrient planners on how to fertilize using biosolids. We propose that land application in high-precipitation areas not be prohibited as long as nutrient uptake can be rationalized. The RDN does not support the requirement in the Ag Waste Reg for storage over impermeable surfaces as biosolids are already tarped during the rainy season.

10 Additional Housekeeping Changes

Q10: Do you have any comments on the proposed “housekeeping” changes? (IP page 38)

no comment

11 Additional Comments

Q11.1: Do you have any comments on the section titled **Development of Guidance**? (IP page 38)

Guidance should be developed for the analysis of foreign matter.

Guidance should be available on the sampling and analysis of CECs to enable standardization of methodology and consistency in interpreting results.

There is currently no guidance on the composting of cannabis. Guidance on processing cannabis, or its growing medium, as a feedstock would benefit operators.

Q11.2: Do you have any comments on the section titled **Assuring Compliance**? (IP page 39)

no comments

12 Overall Summary Questions

S.1 Level of support: Please indicate your level of support for the proposed amendments to OMRR as described in the September 2018 Policy Intentions Paper.

(Select from the scale below; 1 = Not at all supportive; 6 = Extremely supportive)

	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Not at all supportive	1	2	3	4	5	6	Extremely supportive

S.2 Reasons: What are the reasons for your choice?

S.3 Summary comments: Do you have any further comments on the September 2018 Policy Intentions Paper?

The intentions paper does not consider the potential to regulate stockpiled organics not undergoing composting (i.e. supplying a compost facility, processing organics for use as a fuel or soil blending). These activities can have the same impacts (e.g. leachate, odour, spontaneous combustion) as an active compost facility and should be regulated. A threshold of 1,000 tonnes/year of compostable material received at the site may be appropriate for notification, record keeping and meeting at least some basic standards.

13 Contact Information

If you wish to receive further information concerning updates to the Organic Matter Recycling Regulation, please provide your contact information – including an email address – below.

All submissions will be reviewed for inclusion without attribution in a consultation summary report to be made public following the consultation period. Please note that comments you provide and information that identifies you as the source of those comments may be publicly available if a Freedom of Information request is made under the *Freedom of Information and Protection of Privacy Act*.

Contact Name:

Business or Organization Name (if appropriate):

Email:

Mailing Address:

Telephone:

14 Background and Area of Interest

Please mark an “X” in the appropriate boxes if your primary interest in the ministry’s intentions relates to:

- Work in the agricultural sector:
Please describe your work and/or sector (e.g., field crops, poultry, dairy, berry crops, greenhouse, fruit grower):
- Work in the private sector consulting to or supporting the agricultural sector:
Please describe the primary nature of your work (e.g., agrologist, supplier):
- Work for a government regulatory agency:
Please describe (e.g., federal, provincial, municipal): local government
- Work for a public sector organization:
Please describe (e.g., health authority, education institution, Crown corporation):
- First Nation
Please describe:
- Involvement or work for an environmental or community interest group
Please describe:
- Other interest:
Please describe: