March 24, 2026

To the Metro Vancouver Board and Zero Waste Committee,
cc: Minister Dix, Minister Davidson, Avery Gottfried, Deb Epps,
solidwasteoperations@metrovancouver.org, Paul Henderson

Re: Solid Waste Management Planning

Dear Director or Zero Waste Committee Member,

Zero Waste BC is a non-profit association dedicated to driving systemic change towards Zero Waste in BC. We are writing to you because we are very concerned that the new solid waste management plan may be approved without decision-makers having a clear idea of the financial consequences or risks of approving such a plan. To date there have been piecemeal approvals of items like district energy and electricity sales contracts that collectively will make it harder for decision-makers to then shut down the facility once the actual costs are known. It is important that all of the facts and financial consequences are known before key decisions are made to avoid a repeat of the issues surrounding the liquid waste management system. This letter outlines the key issues and recommendations. In particular, we are concerned about the lack of financial transparency in assessing options for waste disposal. As a Director or Committee member, please ensure that decisions are not being made in haste without considering the potential negative consequences on human health, the environment, and use of taxpayer dollars. We urge you to not approve the Solid Waste Management Plan until these key issues are addressed.

Background

Zero Waste is defined as the "conservation of all resources by means of responsible production, consumption, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health". Our current resource consumption system is a linear take-make-waste system. Linear resource consumption systems create waste and other forms of pollution, deplete resources, change land uses, and diminish biodiversity by design. They also generate a huge amount of greenhouse gases which constitute just some of the discharges that threaten the economy, human health, and the environment. Here is the link to the updated Zero Waste Hierarchy which should be followed when developing waste solutions. Zero Waste BC is on Metro Vancouver's Public Technical Advisory Committee and has also participated in hosting some Collaborative Engagement sessions and we are very concerned about the solid waste planning process.

In the absence of a robust analysis for residual waste disposal options as part of the solid waste management planning process, we have been doing our own analysis with the publicly available information, however staff have shown different accounting for disposal costs. Despite repeated requests for more information, none was forthcoming leading us to file a request under the *Freedom of Information and Protection of Privacy Act* (FOIPPA). We also requested information on dioxins including the October 2025 dioxin testing of a rooftop nearby the incinerator, lifespan and maintenance needs of the incinerator, correspondence with the Province regarding waste planning and the incinerator, radioactive materials in waste, waste costs per tonne, climate pollution and waste planning but were told that this would cost over $170,000 to provide. A scaled back request did reveal the spreadsheet numbers used by Metro Vancouver staff to determine the disposal costs (Zero Waste Committee meeting Sept 11, 2025). The request also highlighted that the reports on maintenance assessment for the incinerator and the October 2025 dioxin rooftop testing results had yet to be received.

Recalculations

Using this cost data, we were able to create a spreadsheet using the formulas for calculating the disposal numbers. This showed several issues with how the per tonne disposal costs were calculated:

1. The costs for the Recycling and Waste Centres were apportioned to each disposal type based on the proportion of waste that flowed to them. This is problematic for two reasons. The first is that these facilities are needed regardless of where the waste flows and as the focus turns more to Zero Waste, their function should also evolve to include more opportunities for reuse, repair and recycling. The second is that the costs will vary each year based on which disposal locations takes the most waste. For example, if in one year, all the waste went to one facility, then that facility would bear 100% of the Recycling and Waste Centre costs making the disposal costs immediately much more expensive (and the costs per tonne only known at the end of the fiscal year) despite the fact that the actual disposal costs to receive waste at that facility had not changed.
2. The 2024 numbers which were the key ones shown to the Zero Waste Committee include an insurance payout for a malfunction issue at the incinerator. In the 2024 accounting year, that resulted in an almost $4 million reduction in costs of the incinerator. This should not be an ongoing revenue source (though these types of issues may increase in frequency as the incinerator is past its useful life). This means that the 2024 numbers provided should not be used to make decisions as they are anomalous.
3. For 2024, a new category of revenue was added -special handling waste tipping fee increment -where an additional fee is charged for managing specific types of waste going to the incinerator. These include:
    - international airline waste
    - international marine waste
    - out of region special handling waste
    - pharmaceuticals
    - police loads
    - special handling waste (not defined).

   This is problematic as either this waste is municipal solid waste, which is what the incinerator's operational certificate authorizes it to burn, or it is another type of waste that must be approved by the Director (provincial) and follow the steps outlined in section 2.8 of the Operational Certificate). So either the regional district is accepting types of waste that it is not required to manage (displacing volume for other waste and incurring contingency costs) or it is charging extra for types of waste it is meant to manage already.

The table below shows the costs for each disposal option with the following details:

- the first row is the costs provided by Metro Vancouver under the FOIPPA request and shown at the Sept 2025 ZWC meeting.
- the next row is corrected by not apportioning the Recycling and Waste Centre (R&WC) costs to disposal costs and does not including the insurance claim but does assume the full electricity sales occurred
- the third row further subtracts the special handling incremental fees
- the next row includes debt servicing as budgeted (which only applies to the incinerator as the other two disposal options are not owned by Metro Vancouver and in 2024 the debt payment was less than the budgeted amount)
- the final row with what the costs would have been if the new incinerator management contract were in place at that time. Note that the new contract is $245 million over 5 years, averaged at $49 million per year. More accurate costing in term of split between operations and capital is not possible due to lack of publicly available data but it will be important for the Board and Committee to understand the impact on future costs which are all associated with the incinerator.

2024 Disposal Costs per Tonne	Vancouver Landfill	Incinerator	External landfill
Metro Van claimed costs provided under FOI	$123.17	$122.86	$230.55
Without R&WC costs + insurance claim	$79.65	$109.58	$175.89
+ Without special handling	$79.65	$116.24	$175.89
+ With debt servicing as budgeted	$79.65	$118.15	$175.89
+ If new incinerator management contract were in place in 2024	$79.65	$192.47	$175.89

Capital costs and debt servicing

Metro Vancouver budget reports previously outlined the specific capital items for the incinerator which showed an itemized replacement of the incinerator piece by piece but since we conducted our Case Study on Metro Vancouver using that data, the budget now just has one line “WTEF Maintenance” meaning that there is no accountability for if an item was repaired, replaced, etc., in what fiscal year, if the work actually took place or was carried over, nor a comprehensive understanding of to what degree the facility is being rebuilt.

Debt servicing is variable rather than a fixed cost and will increase for the incinerator as forecast capital costs are incurred so it may be best to have these as a separate line for incinerator-related debt in the accounting, as well as information on total debt associated with the incinerator. The amount paid back in a given year is discretionary (i.e. the amount paid back or included in the budget varies with the direction of the Board) -for example, in 2024 the budget called for $12.47 million of total solid waste debt servicing, however the actual payment was reduced to $10.64 million.

The final report from HDR on waste to energy facility condition assessment (a project started in 2023 but for which we were told that the final report is not yet available) should provide decision-makers information on what the upcoming capital needs are to keep this 38 year-old facility running. Most incinerators have reached the end of their useful lives at this age or would require a significant rebuild or refurbishment so this information is crucial for an informed decision. There have already been estimates of over $400 million of capital costs going forward which would rapidly escalate the debt servicing costs of the incinerator, and that is before expected additional needs that would be identified in the report. Future capital costs can impact the cost per tonne considerably. For example, if $400 million were spent on capital costs for the incinerator and paid back over 20 years (not including any interest for simple math), then that **adds** $80 per tonne of costs to all waste going to the incinerator (assuming 250,000 tonnes of waste is burned per year).

In addition, the Province is requiring Metro Vancouver to manage a process to update the Operational Certificate to current standards for pollution control and testing by September 2026. The results and thus the costs of this are unknown.

It should also be made clear that capital costs for the landfills in the five-year plans relate to closed landfills (past disposal) and should not impact analysis for future decisions on disposal options as Metro Vancouver is not using any open landfills it owns.

These numbers show that the Vancouver Landfill is the lowest cost option so Metro Vancouver should work hard to preserve the capacity through pursuing Zero Waste. The incinerator is very costly and forecast to become much more so, while there should be opportunities to reduce the costs of external landfills through better procurement processes. In all cases, funding pursuit of zero waste is the smarter option.

Tie in to budget

The figures provided by Metro Vancouver make it very difficult to see how these numbers align with the five year Financial Plan (2024 costs noted here). For many of the categories of costs shown in the numbers provided under the FOI request, it is hard to tell under which line item they fall.

ZERO waste
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Contingency costs are not apparent in the solid waste budget but should be so that decision-makers can see the actual costs. It is important to understand that if waste is not reduced, these costs continue yet are not shown in the budgets giving the appearance that there is no financial consequence for missing waste reduction targets.

Recommendations:

1. **Accountability** -Include solid waste management in the public enquiry started to examine the management of liquid waste.
2. **Financial transparency** -Require budgets to be more accurate and specific. Require actual cost data to be included for the three years prior in the Five Year Financial Plans in order to understand trends and changes in accounting practices.
3. **Informed Decision-making** -Require an independent analysis of residual disposal options including accurate costing for previous years and estimates of costs over the time frame of the next solid waste management plan **before** the plan is approved.
4. **Protect the community and environment** -Require a report on the source of the dioxins on the rooftop near the incinerator and a plan for the next steps which must include more comprehensive testing of stack emissions, soil, water and sediments to ensure the facility is not polluting the surrounding area and incurring risk and possible costs for Metro Vancouver. This is basic due diligence.
5. **Transparency to partners**- Develop a system to ensure key interest holders are kept informed. This must include decision makers of the Zero Waste Committee, Board and municipal councils; First Nations; local Health Authorities; the Province; the public and others. The results from implementing the recommendations above should be made public as soon as the results are available. This is also important to the 385 people and organizations that signed our petition asking Metro Vancouver to shut down the incinerator.

For transparency, I am also including the spreadsheet used to develop this and we are happy to receive feedback on it or explain the calculations as well as to learn further about the Metro Vancouver cost calculations.

We hope that implementing these recommendations can put Metro Vancouver on the path to becoming a leader in reducing solid waste. Please contact me if you have any questions.

Sincerely,

Sue Maxwell,
Chair
Zero Waste BC