

Jan 27, 2026, corrected Feb 10, 2026

To tarificationducabone-carbonpricing@ec.gc.ca

Re: Discussion paper - <https://www.canada.ca/content/dam/eccc/documents/pdf/climate-change/carbon-pricing-benchmark-consultation/Discussion-Paper-Driving-Effective-Carbon-Markets-Canada.pdf>

To Whom It May Concern,

Thank you for the opportunity to provide feedback on this important topic. Zero Waste BC is a non-profit association dedicated to driving systemic change towards Zero Waste and a Circular Economy in BC. Zero Waste is 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. Zero waste and circular economy actions can be key methods of reducing greenhouse gas emissions.

The [Zero Waste Hierarchy](#) is an internationally peer-reviewed hierarchy that is our guide to achieving reduced emissions, reduce waste, reduced environmental impact and increased resiliency. This hierarchy deems waste to energy (also called incineration, gasification, plasmification, chemical recycling to fuel, advanced recycling, creation of refuse derived fuel) as unacceptable. This is for many reasons including the fact that it destroys the materials, wastes the energy it took to create them, drives continued waste production and deters positive solutions. With this in mind, we think that the closer look at carbon markets can correct a key gap in the current system does not address GHGs that come from burning fossil fuels (usually in the form of plastics) at these facilities. It is essential that clean energy does NOT include waste to energy. We have developed a more comprehensive climate analysis showing the comparison of waste to energy to other waste options (recycling/composting or landfilling) and this mirrors published research on how waste to energy compares as a source of energy.^{1,2}

Our feedback is as follows:

- Annex A notes waste is to be included however it is unclear how this is defined. We support the inclusion of all waste to energy and incineration facilities as well as cement kilns (they are increasingly a form of less regulated waste incineration). This is important to ensure decision makers have all the information in making decisions and that as requirements for landfill methane improve, there is not a perverse incentive that drives further waste incineration to the detriment of our climate.

¹ Zero Waste BC (2023). The Whole Picture -Climate Impacts from Waste to Energy. Accessed at <https://drive.google.com/file/d/1V5uhUcEnmnow0rKQgXDbhpwBmHLFTRNZ/view>.

² Tangri, N. (2023). Waste incinerators undermine clean energy goals. PLOS Climate, 2(6), e0000100. <https://doi.org/10.1371/journal.pclm.0000100>

- Note that BC OBPS was created based on the federal system which did not have waste to energy included but provincial staff are aware of the need to ensure carbon pricing reflects the emissions from these sources as well.
- The plastics/fossil fuel industry is planning for increased plastic use to offset lower gasoline sales. The industry also frequently proposes the use of end of use plastics as fuel rather than redesigning systems and products to avoid plastic waste at the end of use.³ It is therefore essential that a carbon tax is placed upon this burning of a fossil fuel as a way to ensure the proper costs are internalized.
- For district energy systems -waste to energy systems should not be connected to district energy systems as they create a reliance on waste. There should be no credits granted to energy from waste for any uses. This would copy California who withdrew their preference for waste to energy facilities, one of the many reasons leading to their closure. The direct combustion of waste is not eligible in the California Renewable Portfolio Standard.⁴
- These waste to energy/incineration facilities use electricity and fossil fuel to get to and maintain high enough temperatures and it is important that that fuel has a carbon price attached.
- It is unclear on where methane from landfills fit in as the discussion paper notes methane regulations cover oil and gas so that is exempt but it is unclear if the landfill methane regulations then exempt landfills. We support all emissions being addressed.

On the Approach

- While consideration is given to competition between smaller and larger facilities conducting the same activity, for waste it is important to note that all waste to energy facilities are in direct competition with landfills and waste minimization activities (like reuse, recycling, composting, etc.) and so all of the waste to energy activity must be covered to properly reflect the environmental harms and provide accurate information to decision-makers.

On the Emissions Reductions Account

- Investment in eligible decarbonization projects should not permit carbon capture as it is unproven, expensive and essentially loses time to reduce carbon. Carbon capture and storage should not be encouraged for waste to energy facilities as these facilities should

³ Center for Climate Integrity (2024). The Fraud of Plastic Recycling.
<https://climateintegrity.org/uploads/media/Fraud-of-Plastic-Recycling-2024.pdf>.

⁴ DSIRE (2025). Renewables Portfolio Standard. <https://programs.dsireusa.org/system/program/detail/840>

be phased out. Carbon pricing will help to ensure this loophole does not encourage poor decision-making.

- If the system allows the use of pre-approved technology, this will drive lobbying efforts to approve possibly suspect and ineffective systems rather than supporting well known and scientifically credible systems.
- Tradable credits should be within a sector so the carbon reduced in one facility is offsetting the carbon produced in a similar facility to drive efficiency. Allowing investment in forestry/tree planting, etc. may just be exacerbate loopholes in carbon accounting rather than meaningfully decreasing emissions.

On Transparency

- BC has started recording the biogenic emissions portion that comes from woody biomass (but does not include items from products made from wood like furniture, paper, cardboard, etc.). We encourage a system that has biogenic emissions split into annual biogenic emission (from annual crops) and “other” (from any material coming from trees including cardboard/wood/paper). The portion for “other” should be included in the pricing to support better decision making, and reflect the reality of carbon circulation as it will take decades or longer for this carbon to be incorporated into new trees.
- We support timely and transparent info.
- Data should include both burning of materials as fuel or selling waste materials to be used as fuel.

We would be happy to elaborate further on any of these comments.

Sincerely,
Sue Maxwell
Chair,
Zero Waste BC