

April 16, 2020

Via email - Minister.Environment@novascotia.ca

Nova Scotia Provincial Government
Environment Office of the Minister
Gordon Wilson, MLA
PO Box 442, Halifax, NS B3J 2P8

Dear Minister Wilson:

RE: Variance Correspondence of April 9, 2020 – File Number: 10700-40 -56069

The Northern Region Committee convened online on April 15th, 2020 to address the items that were listed in the April 9, 2020 letter to Regional Chairs Chair, Leland Anthony. In reference to your department receiving requests to vary the solid waste resource management regulations to allow the disposal of recyclable materials during the COVID-19 emergency.

The Northern Region Committee discussed the following items outlined in your letter:

- Blue bag processing facilities and/or relevant municipalities have attempted to maintain operations
- Continue collection and processing operations, even reduced operations, while adequately addressing the concerns of staff
- Cut back on collection schedules
- Ask residents to store recyclables for a period of time
- Store blue bags collected at municipal or private sector facilities or seek out other potential storage locations
- Determine if the blue bag processing facilities can process stored materials once operations get back to normal

The collective responses are below:

- **Blue bag processing facilities attempt to maintain operations and continue collection and processing operations, even reduced operations, while adequately addressing the concerns of staff.** The Colchester Material Recovery Facility (MRF) requires 33 employees to work in close proximity to one another, for a ten-hour period, per day. The reason being that most of the workers are stationed in specifically designated areas along a conveyor belt with specific types of material to be picked off the conveyor line. In many of these cases employees are either shoulder to shoulder or distanced at approximately three feet from each other.

Maintaining the six-foot distancing required while operating the MRF is unattainable. The MRF Manager had the sorting lines and workstations re-measured to determine if there were different options to run, at a reduced capacity. Currently there are no solutions that will keep staff safe and maintain operations.

Staff have a real fear that the blue bag materials could possibly be contaminated by the Covid 19 virus. This is a very serious operational issue and difficult to address as much is unknown. Studies state that the virus can live on a package for up to two or three days, with some stating in the right environment/material, it could be up to nine days. Without the ability to hold the material for over nine days before processing, staff would, rightfully, be fearful and there would be added stress to the workforce.

For many years the Colchester MRF has been mandated to have all staff wear N95 masks while working to protect their lungs from bacteria, fungi and spores. Staff safety is a high priority. Staff would undoubtedly change their masks more frequently from fear. This would place an exceptional pressure on the already strained worldwide situation of the shortage of the N95 masks and would go against the requirement of saving the N95 masks for frontline health workers.

These are the driving health and safety risks that make it not possible to safely operate the Colchester MRF. It was agreed by management that we could not adequately meet restrictions put in place to provide a safe work environment for our staff and limit the risk of spreading Covid-19 at this site.

➤ **Cut back on collection schedules and ask residents to store recyclables for a period of time**

This was done for a two-week period in Colchester, Truro and Stewiacke and ended on April 8, thus the residents held four weeks of recyclable materials. Given the volume of material it was decided anything greater than a normal two-week period would not be reasonable. Curbside residential collection was resumed, and the contracted hauler has reported record breaking tonnages being collected in all three streams, garbage, organics and recyclables.

Other Municipalities within the Region have not asked their residents to store their recyclables and have continued to provide collection. Urban residents that are living in apartments do not have the capacity to store materials beyond a two-week period. Some felt that residents were losing enough freedom and services that they didn't want to add to their misery. There were anecdotal stories of rodents seeking new food sources with the closure of the commercial sector and they are moving out to the residential areas. These creatures can quickly adapt and move into storage areas, barns and older homes that are found throughout the Northern Region.

The solid waste disposal facilities are closed to the public. In our collective experience, we know that some residents would ultimately find their own solutions for disposal. The typical responses for some would be to burn or illegally dump it, which is more harmful to the environment. These were some of the reasons the Municipalities continued to collect. In Colchester, there was public pressure to resume collection.

➤ **Store blue bags and determine if the blue bag processing facilities can process stored materials once operations get back to normal.**

Storage of recyclable materials is not a solution for a long term. As we know, not everyone cleans their recycling containers properly, and this causes additional mold and contamination issues. Papers stored outside for weeks, without coverage become wet and unrecyclable.

At the Colchester MRF a 24-hour notice was given to the 14 municipal clients that bring their material to Colchester MRF for processing. They were told that operations would cease due to Covid 19. The MRF provides services to over 145,000 people. Within those 24 hours the inside storage area on the tip floor was filled. Some material had to be left outside. This material will degrade outside, and most of it will be unable to meet marketable requirements. Currently material is also being held on the Colchester Balefill tipping floor. This area is also rapidly running out space.

Storage of large volumes of combustible and unprocessed materials can increase the potential risk of fire. The East Hants transfer station and Cumberland Joint Services Management Authority MRF have both experienced detrimental fires in their facilities. The Mun. of East Hants was able to repair their building but the CJSMA's MRF was a total loss. Last week, the Colchester Balefill was able to quickly address a smoking bale of garbage – the source of the fire was deemed to be an outdoor solar light where the battery was compromised, and it ignited inside the baler.

It is increasingly more challenging for the workers to perform their normal operational tasks. They are coping with social distancing and presently reduced space to operate due to the increased storage of bags of recyclables on the East Hants and Colchester Balefill tip floors. Moral is lowering among staff as there are increasing concerns of Covid 19 exposure and of a potential fire threat.

The Colchester MRF has an even larger issue of processing capacity. The MRF can process daily material received at a volume of 25 Metric Tonnes per day. During normal operations staff can't process the typical material volumes without incurring some overtime at normal production levels. Currently there is a stockpile of approximately 60 MT and daily another 10 MT is added from Colchester, Stewiacke & Truro. This makes the concept of continuing stockpiling not feasible for this material. This material cannot be processed while handling regular incoming material, once normal operations resume.

Presently, only a limited number of institutional, commercial and industrial businesses are in operation. The hospitals, grocery stores, seniors homes and identified essential services are in operation and they are generating waste and resources that are still being collected as well and being stored.

In addition to processing challenges, the end market requirements for the quality of materials and pricing must also be a consideration. Prior to Covid 19, there were global, national and local challenges for marketable materials. Most materials were being sold at lower prices and at a much slower pace. The market for MRF plastic film stopped and currently is being stored outside and is

further degrading, becoming more unmarketable for recycling each day. The markets were requiring high quality bales with zero tolerance for contamination. Stockpiled material becomes contaminated and difficult to process thus most would end up as MRF residual. The banned recyclable materials being generated during the Covid 19 pandemic would be best suited to be directly landfilled until normal operations can resume. It will take time for end market processors to recover from the pandemic as well.

The request for variance to landfill recyclables is to ensure staff and infrastructure remains safe and strong, so following this pandemic the essential services of solid waste resource management can quickly and efficiently get back to full business.

Importance of Public Messaging

The Municipalities within Northern Region are very aware and concerned about ensuring proper public messaging on the landfilling of recyclables. Our residents are very proud of the fact they are recognized leaders in solid waste management, and we want them to continue to be proud. It would be explained that this is temporary and essential due to the state of emergency and safety of our employees.

Continuing to store materials during Covid 19, Municipalities are unable to guarantee the safety of their workers and buildings. Efficient processing of these recyclables will also aid in protecting the safety of the public to ensure Covid 19 isn't further spread. On March 21, 2020 it was reported on Global News that all the SARCAN processing facilities across the Province of Saskatchewan have been closed for the same noted reasons.

Education messages would encourage those that are able to store materials on their properties to continue to do so. We need to be transparent with our public and explain clearly that this decision was not made lightly, it was made due to these unprecedented times. We are aware there will be some degree of backlash and our frontline staff will be fielding these calls and emails.

We trust that you now have a better understanding of the extreme circumstances that our working staff are dealing with and that it is the most logical and operationally/environmentally safe decision to support a variance for the disposal of recyclables during this global pandemic. This variance would only be invoked by the Municipalities when and if required. Not all the Municipalities within Northern Region at the time of writing this correspondence need it immediately. A variance should be provided to all landfills in Nova Scotia as the impacts to clients of the Colchester MRF impact municipalities throughout the province.

Also, within Northern Region, the Municipalities in Cumberland County transport their recyclables to Scotia Recycling in Kentville. In the event they are notified of processing challenges these Municipalities would require permission to bring to the Little Forks Landfill. Again, the variance would be available to be implemented only when required. The requested variance is requested based on a mitigation strategy for many risks, such as Fire, Health and Safety, Virus Suppression (the longer it is contained, the sooner it will dissipate), Capacity Issues, and so forth. Facilities are running out of time and space for safe operations.

Sincerely,

Tom Taggart, Chair Northern Region

CC: Northern Region Municipalities
Leland Anthony, Regional Chairs