

Mr. Vito Spatafora
Chair, Environmental Services Committee
The Regional Municipality of York
17250 Yonge Street Newmarket, Ontario L3Y 6Z1
vspatafora@richmondhill.ca

Re: Sewer Use By-law No. 2011-56, Prohibition of Food Waste Disposers

Dear Mr. Spatafora,
The Canadian Water Quality Association (CWQA) appreciates the consultation workshops arranged by the Region of York held on November 8, 2012 and January 16, 2013 concerning the Region of York's proposal to prohibit the installation of a Food Waste Disposer (FWD).

It is unfortunate that such a detailed consultation did not occur prior to adoption of the Model Sewer Use By-law, as the information shared and dialogue among stakeholders might very well have yielded truly reflective and technically defensible recommendation to the Committee.

In many regions of the world, FWDs play an important role as a consumer-friendly household tool in achieving organic waste diversion and environmental goals. People use FWD to improve their lives by saving time, improving sanitary conditions in and around the home, and helping improve the environment.

CWQA is the industry trade association representing the manufacturers of water treatment systems, and dealers to the industry. CWQA membership includes over 160 Canadian companies in. The water treatment systems industry is essential to ensuring clean water, health, and safety to Canadians. The "*not another drop*" intent in the bylaw is disastrous to the Region's future energy efficiency and water conservation strategies.

Best Practices

We believe that the technical, financial and best practice research that was provided by our member companies for your consideration clearly demonstrated that FWD can play a useful role for diverting food waste scraps from landfill, thereby helping to achieve the goals of the Province and the Region. In comparison to human waste that flows through the York region wastewater infrastructure and facilities, the food scraps processed by FWDs will not impose inordinate environmental or economic costs on the Region, its infrastructure or its facilities, making it an essential option to complement other York Region organic diversion programs.

FWDs are even compliant with the future water conservation strategies and the impending threats of overstrengthening sewage chemistry to your waste water treatment plants. Here the "*every drop counts*" strategy will serve you well in preserving the viability of the investment the Region has made in its WWTP and supporting infrastructure.

Benefits of FWD

During the Consultation workshops we continually heard about the unique York Region situation that raised concerns about the use of FWDs. To be clear, we have not found the York Region's sewer and wastewater facilities and infrastructure to be unique in respect to use of FWD when compared to similarly sized municipalities. We found that the aforementioned research, information and data that was provided to York Region

demonstrates that a growing majority of 21st century Canadian cities are encouraging the installation and use of Food Waste Disposers as an effective tool for managing food scraps and for creating a liquid resource rich in organic material for the production of clean water, biogas, and fertilizer products. This is a trend that we see growing as the body of peer reviewed research increases. In the waste water treatment industry, trends underscore that the liquid organic waste stream increasingly is regarded as a resource to be harnessed, not as a waste stream with no value or viewed cost burden. This is especially so as a complement to the organic green bin programs since conveyance via the sewer system is already taken into account, and the infrastructure already well established without any need for additional infrastructure or costs.

Creation of Three-Tier System for FWD

The proposed amendments by York Region to the Sewer Use by-law appear to allow existing FWDs to remain in place and be replaced as necessary, while prohibiting the new installations of a FWD in single residential dwellings.

That distinction is unwarranted and unnecessary, and from a practical standpoint unenforceable; FWDs will continue to be available for sale as the Region does not have the authority to prohibit the sale of these legal products, nor compel retailers to post notices. Also it will confuse our greatest asset in the field- the plumbing inspector. We heard from 2 key inspectors at the last consultation meeting that found them to be of no harmful effect in large single family dwelling communities in the Region.

Moreover, the proposal to allow for the installation of FWD in multi-residential dwellings, with the written consent of the region and under conditions that have not yet been defined, will cause significant public confusion. The multi-residential dwelling proposal creates a public policy whereby some residents of multi-residential dwellings may have access to FWD whereas residents in single residential dwellings will be prohibited from being able to enjoy the convenience and sanitary ability to dispose of food waste scraps.

CWQA is opposed to establishing public policy that treats consumers in the York Region differently whereby residents in a single residential dwelling are offered less opportunity to improve their standard of living if they so choose than others. As a matter of good public policy CWQA is opposed to creating this confusing three-tiered system.

Conclusion

With respect, we submit that the body of technical research, data, and best practices provided to York Region by CWQA member companies is compelling and has provided sufficient evidence to conclude that FWD – at both current and projected installation levels – will not be detrimental to the Region’s existing sewer infrastructure and wastewater treatment facilities.

In fact, FWDs would play an important role as a consumer-friendly household tool in achieving the Region’s organic waste diversion and environmental goals.

Therefore, CWQA remains strongly in opposition to York Region’s proposal to prohibit new installations of FWD. FWD should be regarded as a compelling and complementary food waste diversion tool for use in all residences, including single dwelling properties.

As usual, if you have any questions or concerns, please feel free to contact me at your convenience.

Thank you for your consideration.

Sincerely yours,

Kevin Wong

Executive Director

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