

UBCM ENVIRONMENT ACTION PLAN

PURPOSE

The purpose of the Environmental Action Plan is to:

- identify the major environmental issues that are under consideration;
- describe the current status of the issue; and,
- establish a plan of action.

The plan provides a vehicle for the Environment Committee to report on the activities it has undertaken in the past year and an opportunity for the Annual Convention to approve the directions to be pursued in the upcoming year.

UBCM ENVIRONMENT COMMITTEE

The Environment Committee performs three basic functions:

- advocates changes in federal and provincial environmental policy to assist local government in solving environmental concerns at the local level.
- represents local government in the development of environmental policy at the federal and provincial level.
- promotes and shares information on solutions to environmental problems which local governments have implemented.

The Committee membership is:

Councillor Joanne Monaghan, Kitimat, Chair
Mayor John Ranta, Cache Creek
Director Jim Abram, Comox-Strathcona R.D.

REVIEW OF ACTIONS

Over the past year the Committee co-sponsored an Environmental Conference in April of 1994 to discuss environmental initiatives proposed by the province.

The Committee was consulted on and reviewed a number of legislative, regulatory and policy actions initiated by the provincial government, principally by the Ministry of Environment, Lands and Parks in 1994, including the following:

Legislation

- Bill 29 Environmental Assessment Act

Regulation

- Contaminated Sites
- Solid Waste Management Planning
- Stream Management
- Liquid Waste Permit Fees
- Open Burning

- Paint Stewardship
- Septic Tanks

Consultation

- Environmental Protection Act
- Household Hazardous Waste and Biomedical Waste - Strategy Papers
- Groundwater Management
- Airshed Management
- Pesticide Management Policy
- Liquid Waste Discharge Criteria
- Private Sewage Disposal Facilities
- Floodplain Management

The Annual Report contains further details on the Committees activities.

1994 ACTION PLAN

The Environment Committee has worked with the Ministry of Environment, Lands and Parks over the past year in a number of key areas. One area was in the development of an environmental protocol implementation report. The report is intended to provide a framework for the province and local government to move towards sustainability in a spirit of cooperation and mutual respect. It represents a vision and set of principles to be followed in achieving that goal.

A second area was in the development of the B.C. Environmental Protection Act which is intended to provide the framework for the development of future environmental policy in the province.

A third area is in the development of regulations for contaminated sites which could have a major impact on local government operations.

The Environment Committee recommends four streams to the Environmental Action Plan:

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2. ENVIRONMENTAL PROTOCOL IMPLEMENTATION REPORT

3. B.C. ENVIRONMENTAL PROTECTION ACT

4. CONTAMINATED SITES REGULATIONS

(Note: Items 2, 3, and 4 are printed as separate policy papers.)

ENVIRONMENTAL STATUS AND ACTION REPORT

ENVIRONMENT ISSUES

Brief status updates on the following topics are included below:

Environmental Legislation

- a) Environmental Assessment

Environmental Regulation

- b) Liquid Waste Permit Fees
- c) Paint Stewardship Program
- d) Open Burning

Environmental Policy Development

- e) Solid Waste Management
- f) Beverage Containers
- g) Household Hazardous Waste/Biomedical Waste
- h) Water Management
- i) Airshed Management
- j) Pesticide Management Policy
- k) Liquid Waste Discharge Criteria
- l) Private Sewage Disposal Facilities

ENVIRONMENTAL LEGISLATION

A. Environmental Assessment Act

ISSUE: The role of local government in the determination of environmental assessments. There are two specific areas of concern:

- the nature and type of local government projects which will come under review;
- the nature of local government involvement in project reviews.

STATUS: The Ministry of Environment, Lands and Parks introduced Bill 32 - Environmental Assessment Act into the provincial legislature in 1993. The provincial government agreed to undertake further consultation on the development of a comprehensive environmental assessment policy in the province and indicated that it intended to put forward new legislation in 1994.

UBCM has been involved in extensive consultations on the Environmental Assessment Act and the regulations.

The Environmental Assessment Act (Bill 29) has been approved by the Legislature of British Columbia. It is anticipated that the Act will be proclaimed and come into effect early in 1995.

The new Act establishes a process for the identification of any potential impacts of major projects, including the evaluation of economic and social benefits and measures to prevent or mitigate adverse environmental impacts or other impacts.

The legislation is intended to provide certainty and balance for environmental interests, business interests, local government and the public.

The thresholds established in the regulations are designed to capture major projects and will only affect local government projects which are very large (e.g. solid waste facilities the size of Cache Creek, new sewage treatment facilities designed for a community with over 10,000 population).

Over the coming months work will continue in preparation for the proclamation of the Act and establishment of the new Environmental Assessment Office and Environmental Assessment Board, including:

1. Finalization of the Regulations - Consultation will continue on the draft regulations, which were tabled when the legislation was introduced, with a view to finalizing the thresholds for reviewable projects and the timelines.
2. Development of Guidelines - Work is underway to develop guidelines to assist proponents, the public, First Nations, and other governments to participate in the environmental assessment process.
3. Harmonization - Work is underway to reach an agreement with the federal government to avoid duplication of assessment processes.
4. Transition Planning - Planning has begun for transition from existing review processes to the new environmental assessment process.

ACTION: Local government continue to work with the Environmental Assessment Office on the development of the regulations related to the new environmental assessment legislation.

ENVIRONMENTAL REGULATIONS

B. Liquid Waste Permit Fees

ISSUE: The fees imposed by the province on local government should reflect the nature of the treatment and the volume of waste being disposed.

STATUS: The provincial government undertook a review of waste permit fees and released a discussion paper "Revising British Columbia's Waste Discharge Permit Fee System." The province indicated that it would be introducing new liquid waste permit fees based on the volume and toxicity of the discharge, which when first implemented appeared to substantially reduce the charges paid by the majority of local governments. The new rates were introduced in 1992 and under this

regulation local government liquid waste permit fees were limited to the concentration of BOD and total suspended solids (TSS).

At the request of industry the Ministry in 1992/93 undertook a review of its permit fee policy and the scientific basis on which future permit fees would be determined. The Ministry during this review looked at a number of different models on which to base a new fee structure and future permit fees for liquid, solid and air wastes. At the end of the review the Ministry of Environment, Lands and Parks determined that it would revise the regulations for liquid waste permit fees and a new updated regulation was released on April 6, 1994. The impact of the new proposed regulation on local government would be to:

- remove the limitation of local government liquid permit fees to the concentration of BOD and TSS and require that the fee be based on all contaminants listed in the permit;
- allow regional offices to establish core discharge factors for municipal liquid waste and amend existing permits to reflect actual discharges and core discharge factors;
- reduce the fee-per-tonne for BOD and TSS by approximately 50%;
- the overall permit fees for local government was estimated to drop by approximately 51% in the short run.

The overall impact of the new regulation in the short term would appear to lower the permit fees paid by local government. However, in the long term it would allow a Regional Manager from the Ministry of Environment, Lands and Parks to amend local government permits and to add any contaminants which may appear in its test samples, which could dramatically increase the fee that a local government would be charged.

The UBCM has written the provincial government and requested clarification from the Ministry that it did not intend to increase revenues by amending local waste permit fees and adding contaminants to its permits which may be identified in test samples forwarded to the Ministry for review.

A regulation is expected to go to cabinet in September proposing the implementation of the new waste permit fee structure, with a requirement that one years notice be provided to local government before a fee increase is implemented.

ACTION: Local government work with the Ministry of Environment, Lands and Parks in the development of a liquid waste permit fee regulation that is fair and equitable.

C. Paint Stewardship

ISSUE: Local governments role in a paint industry funded and operated program to address the problem of post-consumer paint and divert it from landfill sites.

STATUS: The provincial government has passed a regulation requiring the brand owners of paint to develop, fund and operate a stewardship program for waste paint. This program is the first of its kind in Canada.

The regulation requires the industry to have 10 used paint collection centres in the Greater Vancouver Regional District, 5 in the Capital Regional District and one in each of the remaining regional districts, for a total of 42 waste paint collection facilities by September 1, 1995.

The program is to be fully operational by January 1, 1995. The regulation requires that a paint return facility be available within a 4 kilometre radius of purchase in urban areas and a 10 kilometres radius in rural areas. The paint return facilities will accept any brand of paint and/or paint containers free of charge.

It is expected that the many of the collection facilities will likely be located at existing recycling centres and municipal sites. Local government while supporting the program, should be aware that there may be liability issues related to the handling of paint and employees may require special training.

The Ministry of Environment, Lands and Parks has developed guidelines for waste paint collection facilities. These guidelines define the ministry's regulatory requirements for designated paint collection facilities. The operation and costs of the paint collection facilities are the sole responsibility of the paint industry.

ACTION: Local government work with Ministry of Environment, Lands and Parks and the paint industry in the development of a paint stewardship program in identifying suitable collection facilities in their jurisdiction.

Local government request that the cost of training staff and the development of collection facilities be the responsibility of the paint industry.

Local government request that it be exempt from liability actions while participating in the paint stewardship program as an agent for the paint industry.

D. Open Burning - Smoke Control Regulation and Code of Practice

ISSUE: Role of local government in the establishment of standards for smoke management in the community and the impact of these regulations on land use development and industry.

STATUS: Local government currently under the Municipal Act has the authority to pass bylaws governing backyard burning in the community.

In 1993 the Ministry of Environment, Lands and Parks distributed a draft regulation which attempted to regulate open burning throughout the province. A great deal of concern was expressed over the scope of the regulatory control proposed and as a result of these comments have prepared another draft of the regulation for review.

On March 24, 1994 the ministry adopted a new open burning smoke control code of practice and guidelines. The new regulation is intended to focus on urban areas

where smoke is likely to have a high impact on the local population. Two lists have been created a Category A list which is subject to the new regulation and a Category B list which is not subject to the regulation.

Rural areas and backyard burning are exempt from the regulation unless the municipality or regional district choose to pass bylaws regulating smoke control in all or a portion of the area.

All cities, towns and villages as defined under the Municipal Act are to be covered by the regulation and a select number of district municipalities located in the Capital, Central Fraser Valley, Central Okanagan, Dewdney-Allouette, Fraser Cheam, Greater Vancouver, and Okanagan-Similkameen regional districts have been placed in the Category A list.

A local community may request to be added to the Category A list or removed from the Category A list only after undertaking a public consultation process and passage of a resolution on the issue. The request must then be forwarded to the Director of the Air Resources Branch for review and the request must then be approved by cabinet for a change in its category.

The UBCM had requested that a simple process be established to allow local governments, particularly small communities, to change categories and that local government by bylaw be able to establish which category it falls into. The new regulation did remove the requirement that those “district municipalities not specifically identified in the regulation have until September 1, 1994 to determine by bylaw, and to notify the Director of the Air Resources Branch, as to what portion of the community may be covered by the new regulation or its fire protection area will be added to the Category A list”.

ACTION: Local government request that it be able to determine by bylaw which category under the smoke control regulation it wishes to come under.

ENVIRONMENTAL POLICY DEVELOPMENT

E. Solid Waste Management Planning

ISSUE: The responsibility of local government in the development of solid waste management plans, the operation of landfill sites and the financial costs associated with the collection and disposal of recycled goods.

STATUS: The Ministry of Environment, Lands and Parks is in the process of adopting new guidelines to the development of Solid Waste Management Plans outlining the responsibilities of the regional districts, municipalities and the ministry with respect to solid waste management plans.

The Ministry is presently implementing new guidelines associated with the operation and management of landfill sites.

In February 1993 the UBCM prepared a summary of regional district concerns on a proposed draft regulation to the Waste Management Act and proposed that guidelines, rather than a regulation be adopted. Finally in 1994 the Ministry agreed that it did not need a regulation and undertook the development of guidelines and criteria to assist local governments in the development of solid waste management plans.

The UBCM in its submission on the final draft of the proposed new criteria and guidelines for the development of solid waste management plans indicated that local government still had some general concerns about the solid waste management planning process.

1. Flexibility

There is a need for greater flexibility in the planning process to allow for the development of different plans for rural and urban areas. Plans which recognize the need for rural landfill sites, rather than transfer stations and the potential need for different operating criteria for rural and urban landfill sites.

2. Financial Costs

The cost of developing solid waste management plans and the costs of implementing these plans is still an issue. For example, the costs of developing the plan as outlined in the guidelines and the costs of implementing the plans are far more expensive than was anticipated.

The costs of solid waste management are falling on the shoulders of local government and the local taxpayers, rather than the manufacturer of the products. The concept of cradle-to-grave responsibility for products and user pay appears to have disappeared in the determination of who pays for its disposal.

3. Market Development

There is a growing concern that local government cannot effectively undertake recycling programs if it does not have markets for the goods it collects. It was felt that direct provincial assistance was needed to ensure that there would be markets for the goods collected.

The provincial government does not appear to be expanding its requirements for the use of recycled goods or promoting the reuse and recycling of additional products through the expansion of the deposit system.

The recent promotion of industry funded and operated stewardship programs by the Ministry of Environment, Lands and Parks brings into question the future role of the Sustainable Environment Fund and the financial resources that were to be available through this fund to assist local government in managing solid waste.

ACTION: In accordance with existing UBCM policy local government request greater federal and provincial assistance in the development of markets for recycled goods and the coordination of marketing programs.

Local government request financial assistance to cover the cost of transporting recyclables to markets so as to ensure that the program is province wide.

Local government request policy and legislation to ensure that a cradle-to-grave corporate responsibility is enshrined in all goods sold in the market place - mandated refuse reduction, such as requiring standardized containers.

Local government request provincial funding through the sustainable environment fund for solid waste management be expanded and that no additional fees and charges be imposed on local government for the management of solid wastes (i.e. tipping fees).

Local government request the province recognize the need for flexibility in solid waste management planning. The planning process clearly identify the differences between urban and rural areas in the development of solid waste management plans - financial constraints, proximity to markets and other factors - in setting the goals and objectives that are to be achieved.

Local government request increased penalties and increased enforcement against littering and illegal dumping.

Local government request that the province maintain a broad based consultative approach regarding the regional-municipal relationship in the development of solid waste management plans and in the overall management of solid wastes.

F. Beverage Containers

ISSUE: The impact on local government of an expanded beverage container deposit system and the role of local government in this new process.

STATUS: This is a long standing issue and one which UBCM has traditionally favoured an expanded/increased deposit system.

In accordance with that direction, the Ministry during 1991 attempted to have industry develop a private sector container recovery system. While they initially cooperated, that cooperation eventually dissolved and the Ministry then commissioned a proposal for a public sector collection system. These initiatives resulted in the industry resurrecting its proposals for the elimination of deposits and the funding of a "blue box" recovery system.

The provincial cabinet is reviewing ways of expanding the deposit-refund system to enhance the recovery of recyclable containers. The Ministry of Environment, Lands and Parks is working with industry and others in reviewing the options. Industry is once again proposing the creation of any industry operated and funded packaging stewardship program. The role of local government in the development and implementation of a new process for dealing with solid wastes is an issue that is being actively pursued.

ACTION: Local government continue to support the development of an expanded deposit-refund system which will enhance the recovery of recyclable containers, such as the implementation of a deposit on all liquor and wine bottles.

G. Hazardous / Biomedical Wastes

ISSUE: The impact on and role of local government in any provincial program developed to collect special wastes at the household level. The financial costs and liability concerns related to the collection, storage and disposal of household hazardous wastes and other special wastes.

STATUS: The provincial government is in the process of developing a hazardous waste management policy and appointed a Waste Reduction Commissioner to develop and implement this policy. The Commissioner has reported on the following issues:

1. Household Hazardous Wastes.
2. Biomedical waste disposal.

Household Hazardous Waste

The Waste Reduction Commissioner has released her recommendations for a provincial hazardous waste management plan. She proposed the closure of the eight provincially operated hazardous waste storage facilities by June 1994 and that the role of the provincial government be directed toward the establishment of industry funded and operated product stewardship programs. The report recommended that local government facilitate the process toward product stewardship by making the necessary changes to zoning and permit requirements to allow the establishment of depots, by banning products from entering landfill sites as stewardship programs are developed and by promoting public awareness programs.

The province announced on April 8, 1994 the closure of the eight provincially operated hazardous waste storage facilities.

The provincial government has been holding discussions with the Alberta government about using their Swan Hills hazardous waste treatment facility for the treatment and disposal of special hazardous wastes, such as PCBs.

Biomedical Waste

The Waste Reduction Commissioner released her recommendations on biomedical waste in early May. The report recommended that:

- reducing waste generation at source by adopting a comprehensive, yet practical definition of biomedical waste;
- initiating aggressive waste identification, segregation and handling programs;
- establishing a training program that will assist health care workers in proper handling procedures;
- producing waste minimization plans, including routine waste audits to identify and reduce wastes; and

- treating biomedical waste locally.

The report stated that all hospitals should perform waste audits and develop waste minimization plans and that funding for capital equipment to address the handling of biomedical waste should be provided by the Ministry of Health on a one-time-only basis after the plans have been submitted and approved.

The biomedical waste action plan recommended(#13) that “autoclaved biomedical waste be disposed of as a municipal solid non-hazardous waste”. The report stated that local governments had “a moral obligation to accept treated biomedical waste” as “community health facilities serve a vital function within communities” and “unreasonable costs or restrictions place community health care at risk” and “create prohibitive cost impacts for the provincial health care system.”

ACTION: Local government request that the province and/or industry operated and funded programs assume the responsibility for the collection, storage and disposal of household hazardous wastes and biomedical wastes, with all of the costs being paid by the proponent of the program.

Local government request that the province retain responsibility for addressing hazardous wastes in the province.

Local government request that it be exempt from liability for household hazardous wastes (paint etc.), contaminated soils and other special wastes.

H. Water Management

ISSUE: The impact on local government of the development of a new Water Act and new guidelines for resource activities in community watersheds.

STATUS: The Ministry released a discussion paper entitled the Stewardship of the Water: A Review of British Columbia’s Water Management Policy and Legislation. The paper is intended to provide the framework for the development of new legislation which will cover - groundwater management; water pricing; management of activities in and about streams; water management planning; water allocation; floodplain management; and water quality management.

The Ministry in 1994 undertook province wide consultations on its water policy paper - groundwater and stream management.

The provincial government extended the ban on the export of bulk water out of British Columbia.

Stream Management

The Ministry is in the process of drafting regulations governing stream management and is looking at a one-window approach with the federal government.

Groundwater Management

The Ministry is looking at the development of legislation to protect groundwater in designated areas of the province.

Community Watersheds

A Technical Advisory Committee was established to develop new guidelines to replace the outdated Guidelines for Watershed Management of Crown Lands Used as Community Water Supplies (1980). A workshop was held on March 6, 1993 with representatives from a broad range of stakeholder groups - mining, forestry, agriculture, environment, local government and health care - to discuss draft guidelines for resource activities in community watersheds.

The province is expected to release a report on new community watershed guidelines in the near future. The report is expected to recognize community watersheds - identified under the Water Act - as a 'landscape unit' for planning purposes under the Strategic Planning Regulations being developed for the new Forest Practices Code. An area that is given a community watershed designation would be subject to the development of a total resource plan before any resource development was undertaken in it.

Floodplain Management

The Ministry is looking at the development of a new floodplain management policy. UBCM was requested to comment on an early draft of a policy paper under consideration on floodplain management.

ACTION: Local government request that legislation be enacted to protect groundwater.

Local government request that groundwater quality be monitored and that regulations concerning groundwater, be implemented on a selective basis, only where there is an identified water quality related health risk.

Local government request that community watersheds be recognized as a land use under the Forest Act, Water Act and Municipal Act.

I. Airshed Management

ISSUE: Local governments role in the establishment of standards and the management of local airshed emissions, given the growing importance of clean air to the quality of life in local communities.

STATUS: The provincial government has released two discussion papers on airshed management in the province - Ensuring Clean Air: Developing a Clean Air Strategy for B.C. and Smoke Management for the 90's. The Ministry of Environment, Lands and Parks has announced the establishment of a smoke management policy which will eliminate the operation of beehive burners in the province by 1995/96.

The provincial government has delegated the authority for airshed management in the lower mainland to the GVRD and other Fraser Valley regional districts in an effort to allow them to resolve regional air pollution problems and will work with other local governments to develop a similar process on an "as needed basis". A

motor vehicle emission inspection program has been established in the lower mainland in order to reduce air pollution. The provincial government has passed new legislation which will allow it to introduce regulations governing the operation of motor vehicles and wood stoves.

The Ministry has drafted a model bylaw concerning backyard burning. The bylaw proposes two approaches:

1. that local government ban backyard burning totally; or,
2. that local government require citizens to obtain a permit and to limit backyard burning to certain times of the year or to certain times of the week.

ACTION: Local government work with Ministry of Environment, Lands and Parks in the development of a 'sample' backyard burning bylaw which provides a range of options appropriate to British Columbia's diverse local governments.

Local government request legislative authority to become involved in the development of an airshed management plan where there is an identified health risk.

J. Pesticide Management Policy

ISSUE: Local governments role in the establishment of standards and the management of pesticides, given the public concern over the effect of pesticide use on ones health.

STATUS: Local government currently obtains pesticide use permits in the form of service licences and uses pesticides to control weeds in parks, on playing fields and along roads. A number of regional districts have weed control programs to control plants that are harmful to agriculture.

The Ministry of Environment, Lands and Parks, as part of the development of the B.C. Environmental Protection Act, intends to include a new pesticide management policy. This policy will focus on the use of integrated pesticide management programs to reduce the use of pesticides in the long-term.

ACTION: Local government work with Ministry of Environment, Lands and Parks staff in the development of a pesticide management policy that is workable at the local level and encourages the use of integrated pesticide management plans.

K. Liquid Waste Discharge Criteria

ISSUE: The impact on local government of the development of new sewage discharge criteria which will affect the operation of sewage treatment plants, the design of sewage systems and the use of storm sewer works.

STATUS: The Ministry has released a draft discussion paper outlining new criteria for the development and operation of sewage treatment plants.

The new discharge criteria could have a major impact on local government:

- minimum of secondary sewage treatment - no time frame has yet been established, the potential cost to local government of meeting this objective is in the range of \$1 billion dollars (\$600 million GVRD and CRD).
- liquid waste management plans.
- monitoring and testing - increased frequency in testing; toxicity testing (will range from \$1,000 to \$1,650 per year per plant) and if out of compliance could result in studies which would cost between \$10,000 to \$100,000 for a Toxicity Reduction Evaluation.
- new water quality objectives.
- site specific studies/environmental assessments will be required of new sewage plants.
- plant classification and staff certification - \$100 to \$1,600 a year for plant and staff training costs.
- no new combined sewer discharges.
- monitoring and treatment of storm sewage discharges - no standards or time frame have yet been established to implement this policy.
- use of secondary effluent to irrigate crops - no irrigation of food crops used for human consumption.

The UBCM has written the Ministry of Environment, Lands and Parks indicating concern over the potential costs of implementing the new criteria proposed and the need for further consultation to clarify what is intended under the new criteria.

ACTION: Local government work with the Ministry of Environment, Lands and Parks in the development of a new liquid waste discharge criteria which is cost effective and protects the environment.

Local government request that the province not implement new testing procedures that would increase its financial costs.

Local government request financial and technical support from the province in addressing environmental problems which may arise in the liquid waste management process.

L. Private Disposal Facilities

ISSUE: Local governments role in the construction, operation and management of private sewage disposal facilities.

STATUS: There are currently problems related to the ongoing operation and management of private sewage facilities. There does not exist at the present time a process which ensures that private sewage facilities are constructed according to the approved plans, that the facility is operated in accordance with its permit requirements or that the plant is repaired and upgraded when required. The Ministry has released a discussion paper for comment that puts forward as its major option that all future permits for private sewage facilities be issued to local government solely or as a co-permittee with a private person.

The UBCM prepared a submission on Private Sewage Disposal to the Ministry of Environment, Lands and Parks indicating that local government would not support a solution which downloaded the financial costs and liability on it and failed to address the existing problems in the regulatory process.

The UBCM suggested that the provincial government had a general duty to protect the environment and given that it approved the operation of private sewage facilities in the first place, to ensure that there is an adequate regulatory process in place. The province should require that there is a regulatory process in place - one that is either self-regulatory in nature or one that provides for regular inspections by the provincial government to ensure that the facility does not pollute the environment.

The UBCM pointed out that there are two issues that must be addressed. The first issue is how to upgrade existing facilities to ensure that they meet existing standards and do not create future problems. The second issue is how to deal with future requests for the development of private sewage disposal facilities. If it is the intent of the provincial government not to approve any future private sewage disposal facilities then it should outline this policy clearly and put it forward for discussion.

We suggested that the pollution prevention and polluter pay principles should guide the provincial government in its policy development on this matter. The provincial government needs to develop a new regulatory framework which will require a private sewage disposal facility to be responsible for its construction, ongoing operation and maintenance, and future financing requirements in the same way that a public utility is required to do. This policy would require the private disposal facility to take responsibility for ensuring that it did not pollute the environment and would require the users of the facility to pay for its day to day operation and ongoing maintenance requirements.

The UBCM indicated that there may be an opportunity for local governments in some cases to assist the province in addressing the issue of private sewage disposal facilities and their integration into the land use planning process. A full discussion, however, needs to take place on the future role and direction of local government in this area and whether or not the approval and/or operation of privately operated sewage facilities is one of the powers it is willing to consider. There will need to be clear legislative and regulatory authority in place concerning the operation of private sewage facilities to ensure that if a local government is involved it does assume additional financial or liability responsibilities as a result of its involvement.

ACTION: Local government request that the provincial government implement a regulatory process governing privately operated sewage facilities which will ensure that they meet their permit requirements and have the financial resources necessary to properly maintain and operate the facility.

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