



**Halifax Waste-Resource Society**  
**P.O. Box 213**  
**Lakeside, NS**  
**B3T 1M6**

*Via E-Mail*  
*mike.savage@halifax.ca*

March 18, 2021

Mayor Mike Savage  
Halifax Regional Municipality  
Halifax, N.S.

Dear Mayor Mike Savage,

On March 7, 2021, CMC submitted a report in response to HRM Staff's proposal to remove the FEP & WSF. The Halifax Waste-Resource Society (HWRS) fully endorses CMC's position to continue current processing operations at the Otter Lake Landfill using the Front-End Processor (FEP) & Waste Stabilization Facility (WSF) for the reasons outlined in the report.

The legally binding Agreement between the HRM and the HWRS clearly and unequivocally states,

"Acceptable **Waste** ", means in part , only 'Stable Materials ...that are substantially free of readily putrescible elements after having undergone Biostabilization ...".

And the form of Biostabilization presently used at the Otter Lake Landfill is through the FEP & WSF as identified in both the Agreement and Operating Approval (Permit).

Based on a legal review of the Agreement, HWRS, maintains that any changes to this standard of ' Acceptable Waste ' can only be changed through mutual negotiations that are agreed to by both parties to this legally binding Agreement.

HWRS will accept only changes to the operations that achieve the same level of "Acceptable Waste" that the FEP & WSF presently accomplishes and maintains.

If HRM is interested in exploring an alternative procedure to achieve Acceptable Waste, we invite any proposals you may have for HWRS's consideration. Proposals must be based on the residential garbage volumes currently received at the Otter Lake Landfill (in the range of 40,000 tons per annum). Such procedures must also include changes to the volume of waste in the event that the export of Industrial, Commercial (ICI) waste should return to the Otter Lake Landfill (in the range of approximately 90,000 tons per annum).

In a joint meeting on January 21, 2021, MIRROR and HRM Staff submitted a report to CMC and HWRS Directors, but offered no alternative options to replace what the FEP and WSF achieves in producing acceptable waste. More importantly, MIRROR nor HRM staff could provide any assurance that if the current processing system is removed, residents in the surrounding communities would not suffer from offensive odours, and problems with vermin and or sea gulls.

We were disappointed to learn that in the Spring of 2020, HRM staff verbally requested the Nova Scotia Department of Environment consider waving consultation with the community on a potential application from HRM to remove the FEP & WSF. If true, this clearly is not in the spirit or legal commitment of the Agreement made to the residents and community surrounding the Otter Lake Landfill. This span includes three municipal districts, all with newly elected councillors.

For historical background, we would also point out that on December 4, 2013, Environment Minister, Randy Delorey stated in the House of Assembly that ...  
"no changes will occur with respect to the front-end processing and waste stabilization facility,  
"and "... it is the position of the Department of Environment and government that we will not entertain modifications to the existing approval."  
(HANSARD, December 4, 2013, page 313)

We would also like to reference Council's motion in December, 2014 which was a direction to staff to ' **review**' the efficacy of the FEP/WSF anytime after March 31, 2019. This motion is not to be interpreted as a directive to **remove** the FEP/WSF.

The HWRS would encourage alternative approaches to the work of the FEP & WSF that will achieve acceptable waste for burial at the Otter Lake Landfill but in the absence of an efficacious alternative, removal of the FEP & WSF is irresponsible and unacceptable.

As for the HWRS, we will be considering next steps, if we deem necessary, to stop this continual attempt by HRM staff to remove the current regulations, as stipulated in both the Agreement and your Operating Permit, requiring ' **acceptable waste** ' presently achieved by the FEP & WSF.

Should a proposal to remove the FEP & WSF without an alternative acceptable to the HWRS be put forward, we are requesting that HWRS be invited to present to Council.

Sincerely,



Scott Guthrie, President, HWRS

Copy: Jonathan MacDonald, NSE & Directors, Halifax Waste Resource Society