

Sunday, November 1, 1998

Comments on Draft 2 Guideline Pulp and Paper mill sludge:

The only concern I must register is the fact that Draft 2 guideline was not the original Draft 2 but the amended version after input from PGL Organix.

The PPWC feels that the entire committee should have been party to the unaltered Draft 2 and any amendments should have been made on the basis of comments from the entire group. Having PGL input before reporting to the committee makes the matter confusing and raises issues of trust.

I would like to record the fact that in general the PPWC feels Draft 2 is a significant improvement over the COFI Draft and in general is headed towards developing a realistic set of regulations, not guidelines.

After reading Reach for Unbleached comments on Draft 2 the PPWC agrees in principal with the comments submitted by Reach for Unbleached. As such I will not be submitting a detailed review of the Draft as it would in essence simply be repeating RFU's comments.

At the last meeting the COFI representative suggested that development of this set of regulations (guidelines) was futile without first having done the testing. For once I must agree with COFI on that point.

We must note that until such times as a complete range of tests are done, I cannot see how we could treat this byproduct as anything less than a deleterious substance. Testing must be done not only to address community concerns, but also to satisfy worker health and safety issues, (results to be shared with interested parties, WCB, etc).

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