

Reach for Unbleached!

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RE: Draft 3 Guideline and Regulation for the Application of Pulp and Paper Mill Sludge, October 12, 1999

Reach for Unbleached! is unwilling to participate in a detailed critique of this draft guideline and partial Regulation although it has many obvious flaws as well as several excellent provisions.

Reach for Unbleached! seeks the sustainability of the pulp industry, and thus is committed to the concept of soil enhancement through the return of uncontaminated organic material to the land. However, we are completely opposed to the dumping of toxic waste materials in order to save industry from the proper costs of doing business. Spreading potentially toxic waste across the landscape, by the way, does not qualify as pollution prevention.

Since September 1996 we have donated substantial resources to the Pulp Mill Sludge Advisory Committee in the belief that, eventually, adequate testing would be done because not doing adequate testing seemed unthinkable. Pulp mill effluent contains hundreds of active compounds; treatment systems clean many of those compounds out of the waste water and they, along with many bacterial by-products, wind up in the sludge. But there has been no testing to find out what is really in this sludge, whether it is mutagenic or otherwise harmful to soil organisms, or whether it emits harmful air pollution, either chemical or bacterial.

Meanwhile more and more jurisdictions around North America are reporting problems, groundwater contamination, and even deaths, with paper and sewage sludge spreading which had seemed harmless

Now, this regulation/guideline aims to open the door to the dumping of over 50,000 truckloads of pulp mill sludge a year, on farms, parks and forests. It is clear from the operating practices suggested in the guideline that the Ministry believes this sludge has the potential to contaminate groundwater. This is reckless adventurism for the sake of sympathetic administration.

It certainly denies the essential centrepiece of pollution prevention which requires "compliance plus". Compliance can only be assured if there are clearly stated, monitored and enforced regulations which have been based on reliable information from testing the impacts of the sludge. To go ahead and spread this untested sludge would bring into question the credibility of pollution prevention, a planning process that both industry and government would like to move forward with.

Both the regulation and the guideline are based on self-monitoring by the industry, which has

proved itself incapable of detecting and preventing significant toxic contamination, in the recent past. Nor does the Ministry have the capacity to inspect and enforce these or any other (inadequate) regulations, according to both the federal and provincial Auditor Generals.

These guidelines do not give any legal recourse to citizens held at the mercy of the sludge dumping pulp industry and possibly made ill by that industry. Guidelines of course are merely suggestions, usually disregarded by the forest industry in British Columbia.

The introduction of these regulations without adequate, or even any independent testing, is a violation of the process as it was explained to us in the beginning.

We are completely opposed to this step under these circumstances, and wish to have our objections registered on the record.

Delores Broten,
Executive Director.