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2 February 2000

Harry Vogt
Manager, Pollution Prevention and Remediation Branch
Ministry of Environment, Land and Parks
PO Box 9342, STN PROV GOV
Victoria, BC V8W 9M1

Dear Harry,

Re: Draft 3 Pulp Sludge Guideline and Regulation

Further to our recent conversations, this will confirm that WCEL will not be providing detailed comments on the above documents. While we are pleased to see that the Ministry has drafted a regulation to control the application of pulp sludge, we note that this regulation will have limited application, and that much of this activity will still be governed by a guideline establishing procedures for two classes of sludge.

Given that the Ministry has still not arranged for an independent testing program to analyze the potential effects of spreading these various classes of sludge, we simply cannot evaluate these documents. Until we have some indication of what the impact of this activity would be on the environment, wildlife and workers, we do not feel that we are in a position to comment on the details of the guideline or the regulation.

Our comments on the earlier two drafts of the guideline, several of which will likely apply to the current draft, have all been premised on the understanding that some analysis of the impacts would be forthcoming. We concur with the comments made by Reach for Unbleached! In their notice dated January 21, 2000, and are disappointed that our efforts have not resulted in a stronger position by the Ministry.

Yours truly,

WEST COAST ENVIRONMENTAL LAW

Karen Campbell
Staff Counsel

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