



# *Reach for Unbleached Foundation*

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**To: All BC Municipalities  
All BC Regional Districts  
All BC Medical Health Officers**

The new BC Soil Amendment Code of Practice, implemented September 1, 2007, affects every municipality and regional district in BC. Truckloads of industrial waste mixed with sewage could be arriving in your community any day, to be spread on farms, fields and forests – including watershed lands and food producing land.

Please become informed and act to help prevent the widespread contamination of British Columbia.

What you can do:

- Familiarize yourself, your colleagues and your constituents with these issues and concerns.
- Sign on to the letter below from citizens groups and affiliations to the BC Minister of Environment.
- Pass resolutions and motions at the local level that address your position and the concerns of your constituents.

For more information, please visit <http://www.croftonair.org> or <http://www.rfu.org>.

Contact [rwiltzen@telus.net](mailto:rwiltzen@telus.net) or call (250) 537-1942.

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## ***An Open Letter to Barry Penner, Minister of the Environment for British Columbia.***

Dear Minister Penner:

The Soil Amendment Code of Practice, recently passed and effective as of September 1, 2007 will facilitate the land-spreading of industrial toxic waste, including pulp mill sludge, fly ash and domestic and industrial sewage and water treatment sludge. We urge you to immediately reverse this decision and not allow any further spreading of hazardous industrial waste on B.C.'s farms and forests.

Industrial waste treatment and domestic sewage treatment result in sludge containing the harmful substances removed from liquid waste before treated effluent is returned to the environment. It is therefore incomprehensible that this toxic sludge can be referred to as 'beneficial' for 'soil amendment' or why it is considered appropriate to return the removed toxins to watershed lands, where they will inevitably end up polluting clean water in the environment. Similarly, fly ash is captured by pollution prevention equipment on combustion facilities in order to prevent the release of toxic particulates into the atmosphere. The deliberate application of these captured toxins to animal grazing and food producing lands, as well as to watershed lands, is unacceptable.

There has been no comprehensive analysis of pulp mill sludge to identify all the potentially harmful chemicals it contains, and the required analysis of the sludge (per section 6) is inadequate. Since we are not fully aware of all the chemicals that could be in sludge, it is impossible to conclude that the sludge is safe simply because dangerous toxins have not been adequately screened for. We do know, however, that pulp mill sludge includes a

range of heavy metals, benzenes and phenolics. Both industrial sludge and domestic sewage sludge can contain a wide array and variability of bacterial and chemical contaminants, including pharmaceuticals and endocrine disrupting chemicals, extremely harmful to human and environmental health. Many of these chemicals could have persistent effects on food-growing soil lasting well beyond the 38 months designated as the maximum time before planting food crops.

There has been no assessment of the impacts on wildlife of dumping hazardous waste in farms, fields and forests. Wildlife do not read 'No Trespassing' signs and nor do they refrain from ingesting food sources from these lands for any designated period.

There is significant history to the issue of landspreading pulp mill sludge and we refer you back to previous efforts to allow virtually unregulated landspreading. Environmental concerns that were raised then remain today unaddressed. The current Code of Practice is even weaker than the previously proposed regulations. It allows a wider range of industrial sources, it has an extremely limited list of chemical parameters for testing, and a severely flawed process with no allowance for any compliance monitoring or enforcement. BC citizens have no recourse as truckloads of sludge are dumped in their communities.

Studies have been completed on alternatives for disposal of sewage and sludge, and we encourage you to put efforts into these rather than continuing to promote the application of sludge to agricultural land. The direct application of untreated waste has not been proven to be safe, while other options have been shown to be viable from an economic, technical and regulatory perspective. In particular, the use of technologies that can recover resources from sludge – including water, heat and biofuel – should be investigated and put into place to avoid future pollution of our waters from sludge land application.

Minister, we urge you to be guided by the Precautionary Principle in this matter and order thorough testing and consideration by independent scientists. Industrial waste needs to be contained as we work towards cleaner production, not spread by the truckload throughout the province.

Jay Ritchlin  
**David Suzuki Foundation**

Stuart Blundell  
**Pulp and Paper Workers of Canada**

Lisa Matthaus  
**Sierra Club of Canada**

Andrea Reimer  
**Wilderness Committee**

Christianne Wilhemson  
**Georgia Strait Alliance**

Pat Reichert  
**Island Natural Growers**

Tzeporah Berman  
**Forest Ethics**

Steve Lawson  
**First Nations Environmental Network**

Delores Broten  
**Reach for Unbleached**

Robert Wiltzen  
**Crofton Airshed Citizens Group**

Mae Burrows  
**Labour Environmental Alliance Society**

Samuel Godfrey  
**Islands Organic Producers Association**

cc. Shane Simpson, NDP Environment critic