

**From:** Philippe Lucas  
**Date:** March 17, 2021 at 9:17:19 AM PDT  
**To:** John Ranns <[jranns@metchosin.ca](mailto:jranns@metchosin.ca)>, Barb Desjardins <[barbara.desjardins@esquimalt.ca](mailto:barbara.desjardins@esquimalt.ca)>  
**Cc:** Tina Hansen <[thansen@metchosin.ca](mailto:thansen@metchosin.ca)>  
**Subject:** Re: biosolids update

Hi John and Barb (and Tina!),

It was great to meet with both of you yesterday - thanks for your time and advice on how to move this issue forward! Attached is the letter I shared yesterday requesting a meeting with Minister Heyman; could you please seek support from your municipalities to have your names added to this letter so you might participate in this important meeting re. modernizing the provincial regulations overseeing the beneficial use of biosolids?

Thanks and best regards,  
Philippe Lucas  
Biosolid Free BC

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On Mar 12, 2021, at 9:52 AM, Philippe Lucas wrote:

Hi Barb and John,

I hope this message finds you well.

I'm happy to share that we've made a bit of progress on the campaign to ban the land application of biosolids on Vancouver Island and throughout BC. I had a very useful meeting with Samuel Godfrey, Senior Ministerial Advisor to Minister of Agriculture Lana Popham, Minister of Agriculture last week. He's agreed to request a review of the potential harms and legal liabilities associated with the land application of biosolids on farmland from the Ministry Agriculture, Food and Fisheries, and has suggested that we send a letter highlighting our concerns and asking for a meeting with Environment Minister Heyman (cc'ing Minister Popham and Minister Rankin, who might also attend).

Attached is a draft of the letter, and I'm now reaching out to Dogwood, Sierra Club of BC, IOPA, the Georgia Strait Alliance, and Organizing for Change to see who'd like to sign on the letter and potentially attend the meeting as well if we're successful in this initiative. Also joining us will be reps from the Comox Valley Regional District, Mt. Work Coalition, the Mid Island Farmers Institute, and Campbell River Environmental Committee.

Any updates or recent developments from the CRD, other than the horrible (but entirely predictable) news that land application at Hartland will already extend well beyond the original mandate due to work safety issues at the cement kiln? I'd be happy to discuss this via phone/skype if you like, and look forward to working with you on this important issue.

BTW, please check out the amazing resourced Mt. Work Coalition put together re. this issue recently: <https://www.mountworkcoalition.org/>

Best regards,  
Philippe Lucas  
Biosolid Free BC  
<Letter to Minister Heyman, 03-01-21.docx>

<b>CORPORATION OF THE TOWNSHIP OF ESQUIMALT</b>		
For Information:		
<input type="checkbox"/> CAO	<input type="checkbox"/> Mayor/Council	
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RECEIVED: MAR 18 2021		
Referred: Rachel		
<input type="checkbox"/> For Action	<input type="checkbox"/> For Response	<input type="checkbox"/> COTW
<input type="checkbox"/> For Report	<input checked="" type="checkbox"/> Council Agenda	<input type="checkbox"/> IC

Dear Minister Heyman,

This letter is to request from the undersigned for a meeting to discuss the land application of biosolids in BC and associated impacts on the environment, food security and public health.

Concerned community members and elected officials in the Comox have now joined many residents, mayors and CRD Directors on southern Vancouver Island, the Mt. Work Coalition, Nicola Valley First Nation Bands and residents, and major regional/provincial and environmental organizations in opposing the land application of biosolids, just as you might recall doing in 2011 during your term at Executive Director of the Sierra Club of BC when you signed a letter of support for a ban on land application of biosolids that was ultimately passed by the CRD in 2011. Unfortunately, we're sorry to share that the situation has not improved since that time, and emerging academic research now adds perfluoroalkyl-and-polyfluoroalkyl substances (PFAs) and microplastics to the growing list of pharmaceuticals, PAHs, and other Chemicals of Emerging Concern (CECs) contained in Class A & B biosolids, and subsequently disbursed throughout BC's forests, farms and fields.

Furthermore, the current OMRR regulations governing land application of biosolids have not kept up with the current state of evidence, and only regulate and require monitoring of a small list of potential contaminants, thereby woefully underestimating the environmental and public health risks. As a result, the Province's existing policies wrongly suggest that the land application of biosolids is both safe and the best possible option to dispose of processed sewage waste, ultimately deterring municipalities from considering safer and more environmentally sustainable options such as pyrolysis/gasification.

Additionally, it has become apparent that while this practice is ongoing and/or expanding in many regions of BC, it is being done with little or no consultation with either regional residents and farmers that may be directly affected, or First Nation communities on whose unceded land biosolids are currently being applied, some of which are still used for wildcrafting by these same Bands.

Would you and your staff have time to meet with us over the next few weeks to discuss what steps might be taken to 1) update the current risk assessment of biosolids, which would include research on Chemicals of Emerging Concern (CECs) such as PFAs and microplastics via an independent scientific review of the state of the evidence; 2) use the resulting info to update the Provincial policies on land application of biosolids in BC in order to ensure we're doing all we can to improve food security, environmental sustainability and public health?

Thanks and best regards,