

January 5, 2022

Attn: Senior Land Officer
Kamloops FLNRORD
441 Columbia Street
Kamloops, BC V2C 2T3

RE: Land Act – Notice of Application for a Disposition of Crown Land (Glencore Canada)

Dear Senior Land Officer,

Please accept this letter summarizing comments of the Central Okanagan's Solid Waste Technical Advisory Committee (SWTAC) relating to the proposed Organic Waste Recycling Facility to be situated on Provincial Crown land (Brenda Mine site).. The SWTAC is comprised of local government staff from the Regional District of Central Okanagan (RDCO) and its Municipal Members, including Peachland, The City of West Kelowna, The City of Kelowna, and the District of Lake Country.

The Central Okanagan SWTAC supports portions of the development and operation of an Organic Waste Recycling Facility to be situated at the Brenda Mine site. Specifically:

- The proximity of this facility allows Central Okanagan governments to make use of the facility to manage Biosolids and other compostable waste streams in region. Existing facilities are either at capacity, or not appropriately sized for large regional volumes. Currently, a large amount of organic material produced within West Kelowna is shipped to Alberta to be processed.
- Processing organic material in-region will enable improved waste reduction services throughout the Regional District to be considered, including the implementation of curbside food scrap collection, reducing landfill bound waste.
- Glencore Canada proposed to apply technology to eliminate offsite odours and manage impacted water on site.
- Composting operations may provide alternative useful life to stockpiled volumes of un-recyclable cardboard developed as a byproduct of the 2021 flood impacts.

The Central Okanagan SWTAC is concerned about the portions of the proposed Organic Waste Recycling Facility to be situated at the Brenda Mine site. Specifically:

- Existing contracts require major local government organic sources to make use of out-of-region service providers to process organic waste until contract conclusion. In the pursuit of immediate contracts, Glencore may commit all available processing capacity to communities and businesses outside of the Central Okanagan. This will perpetuate the management of organic wastes outside of our region, counter to our community desires and strategic priorities.


Ideally, Glencore Canada (Brenda Renewables) will voluntarily set reserve adequate capacity for the processing of local in-region local government (public/community) organic waste at a reasonable market rate. By voluntarily reserving sufficient capacity until appropriate consideration of the service can occur (ie: end of

existing contracts), the RDCO will not need to consider and enact lawful waste import restrictions through its Solid Waste Management Plan.

It is the intention of the RDCO and its Member Municipalities to work together with Glencore Canada (Brenda Renewables) to evaluate in-region processing of this significant waste stream. The RDCO cannot commit to a contractual arrangement with Brenda Renewables for service provision until appropriate due diligence has been completed, including, but not limited to: a feasibility study, a service-appropriate pilot, community engagement, and Board consideration.

Thank you for your time and consideration of our concerns, suggestions, and comments in relation to this application.

Sincerely,

A handwritten signature in black ink, appearing to read 'Travis Kendel', with a large, sweeping loop at the end.

Travis Kendel
Manager of Engineering Services
Chair of Solid Waste Technical Advisory Committee
e. travis.kendel@rdco.com
p. 250-469-6172

cc:

Shawn Grundy (Peachland)
Scott Hoekstra (Kelowna)
Chris Anderson (West Kelowna)
Sid Smith (Lake Country)
David Komaika (RDCO)