



June 30, 2021

Infrastructure Canada  
Communications  
180 Kent Street, Suite 1100  
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Via: [info.info.infc@canada.ca](mailto:info.info.infc@canada.ca)

RE: Waste Management Association of BC Comments With Respect To Canada's National Infrastructure Assessment

To Whom It May Concern,

On behalf of the Waste Management Association of British Columbia (WMABC), I would like to thank you for the opportunity to provide input on Canada's National Infrastructure Assessment.

By way of background, the WMABC comprises private waste & recycling service businesses with over 3,000 employees that provide the majority of the waste and recycling services across the province. As an active participant in the waste management services sector in B.C. We have and continue to provide a critical role in the delivery of efficient and cost-effective waste diversion, recycling and disposal services for the municipal and the industrial, commercial and institutional (IC&I) sectors.

For over 30 years, the Association has acted as a conduit and representative voice for its members in connection with the development and promotion of government policies and programs that increase waste diversion and recycling and move towards the development of a circular economy.

As Canada embarks on historic investments in infrastructure to tackle climate change and transition to a circular economy, there is a lack of reference to environmental projects, particularly in the waste management sector. As an industry, we are particularly proud of our leadership role in waste diversion across the province. The members of the WMABC have and continue to play a pivotal role in enhancing the diversion of materials in both the municipal and the private sector by providing our strengths in logistics and infrastructure to collect and process these materials in an environmentally responsible manner and return them to the economy as secondary resources. We regard these as examples of a sustainable approach to resource reallocation and promotion of a circular economy.

Waste generation in BC is expected to grow exponentially. However, there is a lack of waste diversion and processing infrastructure capacity. The Association strongly believes ensuring adequate waste diversion and processing capacity for BC's solid waste is an economic and environmental necessity for communities, people, and businesses across the province.

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Waste infrastructure projects such as anaerobic digestion, mechanical and thermal processing and other advanced technologies are complex and many of these projects should receive funding at the federal level to help encourage waste processing within the province. This is especially important in a post-Covid economic environment, as BC municipalities and regional governments with capital budgets for infrastructure projects are being challenged to innovate to deliver better outcomes for their communities.

The WMABC recently hosted a webinar on June 23rd where it assembled industry experts in project development and advisory services to address key barriers to and identify solutions for municipalities facilitating the efficient and effective development and delivery of large scale publicly funded waste infrastructure projects. While public private partnerships, or P3s, have been successful with social capital and transportation projects, the procurement and development of large-scale municipal waste infrastructure projects through conventional P3 project models has become increasingly problematic.

During the webinar there was consensus amongst the speakers that the current P3 model when applied to specific environmental infrastructure asset classes (such as those requiring investments of more than \$50-million) shifts too much risk to project developers; focuses on the lowest or fixed bids (to the exclusion of other relevant criteria); is more likely to lead to prohibitive costs for the bid developer; and, that project proposals have become too prescriptive and therefore discourage innovation.

As a result, this presents a barrier to entry for many medium to smaller sized BC companies, which are likely to be affected by the factors to an even greater degree. As such, there are calls from the project development and advisory community for a modified project development model that will increase collaboration, flexibility and transparency, that will, in turn, lead to lower project costs, certainty on project delivery, encourage new and innovative technologies and ensure value-added benefits to the host communities and their respective ratepayers.

The WMABC believes that a dispassionate public policy is needed and stands ready and willing to work with the federal government to address these issues. For further information, please contact Lori Bryan, Executive Director for the WMABC at [lbryan@wmabc.com](mailto:lbryan@wmabc.com)

Sincerely,



Grant Hankins  
President, WMABC

Cc: Laurel Nash, DM, Environmental Protection Division at MOE&CCS  
Carolee Punnett, Infrastructure BC

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