



MIRROR NOVA SCOTIA AND HALIFAX REGIONAL  
MUNICIPALITY

## Public Consultation Report – Application for Approval to Deactivate the FEP and WSF at Otter Lake

NSECC File: 94400-30-BED-2008-065580

# Table of Contents

## Executive Summary

1.0	<b>Introduction</b>	1
2.0	<b>Methods or Approach</b>	3
2.1	Notification .....	3
2.1.1	Webpage.....	3
2.1.2	Newspaper.....	3
2.1.3	Social Media.....	4
2.1.4	Mail-Out.....	4
2.1.5	Direct Communication.....	4
2.2	Public Survey.....	4
2.3	Public Survey Response Analysis.....	5
2.4	Social Media Analysis .....	6
2.5	Emailed and Mailed-In Analysis .....	6
3.0	<b>Consultation Results</b>	7
3.1	Survey .....	7
3.1.1	Overall Results .....	7
3.1.2	Safety of Workers / Increased Traffic at Landfill Disposal Area .....	8
3.1.3	Blowing Litter .....	10
3.1.4	Enhanced Attraction of Birds .....	11
3.1.5	Delivery of Rodents to the Disposal Area .....	13
3.1.6	Dust Generation for Additional Disposal Site Traffic.....	15
3.1.7	Additional Generation of Greenhouse Gases .....	16
3.1.8	Additional Generation of Odours .....	18
3.1.9	Impact to Groundwater Quality.....	20
3.1.10	Impact to Surface Water Quality.....	22
3.1.11	Honouring the Original Community Agreement.....	23
3.1.12	Inability to Reactivate the FEP/WSF .....	25

3.1.13	Other Items Related to the Proposed Deactivation of the FEP/WSF .....	27
3.2	Social Media .....	29
3.3	Emailed and Mailed-In Feedback .....	29
3.4	Otter Lake Community Monitoring Committee Campaign .....	29
4.0	Next Steps .....	31
5.0	Conclusions .....	32

**Figures**

Figure 1: Data Flow Chart .....	5
Figure 2: 5 km Survey Radius .....	6
Figure 3: Overall Survey Results .....	7
Figure 4: Survey Results Summary (Within 5 km) – Safety of Workers / Increased Traffic at the Landfill Disposal Area .....	8
Figure 5: Survey Results Summary (Within 5 km) – Blowing Litter .....	10
Figure 6: Survey Results Summary (Within 5 km) – Enhanced Attraction of Birds .....	12
Figure 7: Survey Results Summary (Within 5 km) – Delivery of Rodents to the Disposal Area .....	14
Figure 8: Survey Results Summary (Within 5 km) – Dust Generation for Additional Disposal Site Traffic .....	15
Figure 9: Survey Results Summary (Within 5 km) – Additional Generation of Greenhouse Gases .....	17
Figure 10: Survey Results Summary (Within 5 km) – Additional Generation of Odours .....	19
Figure 11: Survey Results Summary (Within 5 km) – Impact to Groundwater Quality .....	20
Figure 12: Survey Results Summary (Within 5 km) – Impact to Surface Water Quality .....	22
Figure 13: Survey Results Summary (Within 5 km) – Honouring the Original Community Agreement .....	24
Figure 14: Survey Results Summary (Within 5 km) – Inability to Reactivate the FEP/WSF .....	26
Figure 15: Survey Results Summary (Within 5 km) – Other Items with Respect to the Proposed Deactivation of the FEP/WSF .....	28



## Appendices

---

- A NSECC Information Request
- B Public Consultation Notifications
- C Survey Responses
  - C-1 Survey Responses – Within 5 km of the FEP/WSF (By Postal Code)
  - C-2 Survey Responses – Outside 5 km of the FEP/WSF (By Postal Code)
  - C-3 Survey Responses – Emailed or Mailed Surveys
- D Summary of Survey Responses
  - D-1 Summary of Survey Responses – Within 5 km of the FEP/WSF (By Postal Code)
  - D-2 Summary of Survey Responses – Outside 5 km of the FEP/WSF (By Postal Code)
- E Social Media Comments
- F Emailed and Mailed-In Feedback
  - F-1 Emailed Feedback
  - F-2 Mailed-In Feedback

## Executive Summary

The Otter Lake Waste Processing and Disposal Facility (Otter Lake) was commissioned in 1999 to serve Halifax Regional Municipality (HRM) and included a Front End Processor (FEP) and Waste Stabilization Facility (WSF). The FEP consists of mechanical equipment that processes bagged garbage. The FEP separates waste containing organics such as food waste and sends this material to the WSF for biostabilization prior to landfilling. The FEP/WSF was developed at a time when approximately five percent of HRM's waste materials were diverted from landfill disposal and prior to the implementation of the municipality's green cart program that diverts food waste from landfill disposal.

In both the original 1995 Integrated Resource Management Strategy and the revised 1996 strategy developed by HRM, the FEP/WSF were envisioned to be scaled down as source separation was scaled up. The 2014 Integrated Solid-Waste Resource Management Strategy Review recommended closure of the FEP/WSF. This recommendation of closure was supported by a Stantec report (2013) and validated through a SNC Lavalin peer review report (2013). Following the updates put forward to HRM Regional Council (Council) in 2014, HRM Solid Waste Staff were directed to return to Council with an updated study and recommendations regarding the effectiveness of the FEP/WSF no sooner than March 2019 to assess the impacts of Council's recently approved changes to the solid waste management system which included the following:

- **Clear Bags:** On August 1, 2015, a clear bags policy was implemented for HRM's municipal garbage collection program. This resulted in approximately a 25% reduction in residential garbage processed and landfilled at Otter Lake; and
- **Flow Control:** The export ban for Industrial, Commercial, and Institutional (ICI) waste was removed, allowing ICI waste generated within HRM to be exported to provincially-approved landfills outside the boundaries of HRM. Beginning on March 14, 2016, ICI waste began being exported to other provincially-approved landfills via a transfer station established at Otter Lake. This has resulted in annual savings to the ICI sector in the order of \$5.2 million per year as a result of the high cost to dispose of waste at Otter Lake.

The total quantity of waste processed through the FEP/WSF and landfilled at Otter Lake dropped from over 134,000 tonnes (2014/2015) to just over 45,000 tonnes (2016/2017) after one year of both policies being implemented. This is a trend that has continued to present time.

Due to the change in composition of waste being landfilled since the late 1990s, as well as the success of HRM's solid waste diversion programs, it is believed that the FEP/WSF can be 'deactivated' (essentially paused, able to resume if required), similar to all other municipal solid waste landfills in Nova Scotia, while continuing to operate Otter Lake in an environmentally sound manner with no impacts to the local community.

A Closure Review report was prepared by Dillon Consulting Limited (Dillon) in November 2020 and concluded, based on the results of the analysis, that the FEP/WSF operations could be deactivated without adverse impacts on the local community and environment. This was in large part due to the change in composition of waste being landfilled since the late 1990s, owing to the success of HRM's solid waste program. HRM staff submitted a report to Council recommending that the FEP/WSF should be 'deactivated' (essentially paused, able to resume operations if required). On June 18, 2021, Council accepted staff recommendations, including the submission of an application to Nova Scotia Environment and Climate Change (NSECC) to deactivate the FEP/WSF. This application was submitted to NSECC on August 21, 2021 (Application # 2008-065580-07).

NSECC responded to the application on September 23, 2021 requesting that public consultation with residents within five kilometres (km) of the facility be completed. Public consultation began on November 3, 2021 and concluded on December 6, 2021. Consultation activities were consistent with the recommended consultative process defined by NSECC, included the following activities:

- Notification (webpage, newspaper, social media and mail-out);
- Public survey (online version and printed version); and,
- Additional feedback (letters, email, and social media).

Dillon was retained to assist MIRROR Nova Scotia and HRM with the provision of a public consultation report that outlines the public consultation activities completed and responses received.

In total, from within 5 km of the site, there were 713 survey responses (689 respondents indicated concerns with respect to the proposed deactivation of the FEP/WSF and 24 respondents indicated no concerns). From within 5 km of the site there were also two letters received, 33 emails received and 26 social media comments. A further 1,192 survey responses (1,127 with concerns with respect to the proposed deactivation of the FEP/WSF and 65 with no concerns) were received from outside of 5 km of the site which included seven hard copy survey respondents (mailed and emailed).

Comments received from respondents, social media posts, emails and mailed-in letters, were analyzed to identify the primary items of concern with the proposed changes to FEP/WSF operations.

Based on Dillon's review, the survey responses did not identify any new areas of risk or potential concern beyond those presently identified and addressed in the Amendment Application. While some respondents had no concerns, the majority had concerns overall with deactivating the FEP/WSF including echoing the potential risks that are presently addressed through operational and mitigation measures suggested in the Amendment Application.

Concerns raised by respondents within 5 km of the site were similar to those raised by respondents who lived outside of the 5 km radius. Concerns raised by respondents were related to items such as the following:

- Waste collection vehicle traffic;
- Litter;
- Odours;
- Groundwater and surface water quality;
- Attraction of birds; and,
- Honouring the original agreement.

It is noted that the Otter Lake Community Monitoring Committee (CMC) ran an independent campaign to the public consultation initiated by HRM and MIRROR Nova Scotia that conveyed some inaccurate information with regards to deactivating the FEP/WSF which may have influenced the results through a review of public comments.

Regardless, HRM and MIRROR Nova Scotia have indicated that they take these concerns very seriously and believe the potential risks associated with deactivating the FEP/WSF can be mitigated through the measures suggested in the Amendment Application.

Based on the results of this public consultation, and in response to the information gathered, HRM has indicated that further public communication activities will be completed. This will include an update to the HRM project website to provide a link to this Public Consultation Report, information identified through the analysis of the public consultation responses, Q&As related to this report and the status of the regulatory process.

# Introduction

The Otter Lake Waste Processing and Disposal Facility (Otter Lake) was commissioned in 1999 to serve Halifax Regional Municipality (HRM) and included a Front End Processor (FEP) and Waste Stabilization Facility (WSF). The FEP consists of mechanical equipment that processes bagged garbage. The FEP separates waste containing organics such as food waste and sends this material to the WSF for biostabilization prior to landfilling. The FEP/WSF was developed at a time when approximately five percent of HRM's waste materials were diverted from landfill disposal and prior to the implementation of the municipality's green cart program that diverts food waste from landfill disposal.

In both the original 1995 Integrated/Resource Management Strategy and the revised 1996 strategy developed by HRM the FEP/WSF were envisioned to be scaled down as source separation was scaled up. The 2014 Integrated Solid-Waste Resource Management Strategy Review recommended closure of the FEP/WSF. This recommendation of closure was supported by a Stantec report (2013) and validated through a SNC Lavalin peer review report (2013). Following the updates put forward to HRM Regional Council (Council) in 2014, HRM Solid Waste Staff were directed to return to Council with an updated study and recommendations regarding the effectiveness of the FEP/WSF no sooner than March 2019 to assess the impacts of Council's recently approved changes to the solid waste management system which included the following:

- **Clear Bags:** On August 1, 2015, a clear bags policy was implemented for HRM's municipal garbage collection program. This resulted approximately in a 25% reduction in residential garbage processed and landfilled at Otter Lake; and,
- **Flow Control:** The export ban for Industrial, Commercial, & Institutional (ICI) waste was removed, allowing ICI waste generated within HRM to be exported to provincially-approved landfills outside the boundaries of HRM. Beginning on March 14, 2016, ICI waste began being exported to other provincially-approved landfills via a transfer station established at Otter Lake. This has resulted in annual savings to the ICI sector in the order of \$5.2 million per year as a result of the high cost to dispose of waste at Otter Lake.

The total quantity of waste processed through the FEP/WSF and landfilled at Otter Lake dropped from over 134,000 tonnes (2014/2015) to just over 45,000 tonnes (2016/2017) after one year of both policies being implemented. This is a trend that has continued to present time.

Due to the change in composition of waste being landfilled since the late 1990s, as well as the success of HRM's solid waste diversion programs, it is believed that the FEP/WSF can be 'deactivated' (essentially paused, able to resume if required), similar to all other municipal solid waste landfills in Nova Scotia, while continuing to operate Otter Lake in an environmentally sound manner with no impacts to the local community.



A Closure Review report was prepared by Dillon Consulting Limited (Dillon) in November 2020 and concluded, based on the results of the analysis, that the FEP/WSF operations could be deactivated without adverse impacts on the local community and environment. This was in large part due to the change in composition of waste being landfilled since the late 1990s, owing to the success of HRM's solid waste program. HRM staff submitted a report to Council recommending that the FEP/WSF should be 'deactivated' (essentially paused, able to resume operations if required). On June 18, 2021, Council accepted staff recommendations, including the submission of an application to Nova Scotia Environment and Climate Change (NSECC) to deactivate the FEP/WSF. This application was submitted to NSECC on August 21, 2021 (Application # 2008-065580-07).

NSECC responded to the application on September 23, 2021 indicating that as a result of an initial review, NSECC was requesting that public consultation with residents within five kilometres (km) of the facility occur as a component of the application submission and review process. A copy of the letter has been included in Appendix A.

MIRROR Nova Scotia, HRM's contractor for the operation of the FEP/WSF, and HRM collaborated in the development of the public consultation process. Public consultation began on November 3, 2021 and concluded on December 6, 2021. Consultation activities were consistent with the recommended consultative process defined by NSECC. Dillon was retained to assist MIRROR Nova Scotia and HRM with the provision of a public consultation report that outlines the public consultation activities completed and responses received.

## 2.0 Methods or Approach

Consultation activities, building on the recommended process received from NSECC, included the following activities:

- Notification
  - Webpage
  - Newspaper
  - Social media
  - Mail-out
  - Direct Communication
- Public Survey
  - Online version
  - Printed version (mailed-in or emailed)
- Additional Feedback
  - Email
  - Social Media
  - Letters

The following subsections describe each of the consultation activities.

### 2.1 Notification

Five notification methods were used to inform the public of the consultation program, as outlined below.

#### 2.1.1 Webpage

HRM established a webpage on HRM's municipal website<sup>1</sup>. This webpage included an overview of the FEP/WSF, the Amendment Application, the public consultation process and responses to frequently asked questions. Links to an online survey (see Section 2.2), a printable version (PDF file) of the survey, the HRM staff report recommending the Amendment Application and the Closure Review report were also provided on the HRM website.

#### 2.1.2 Newspaper

Public notices were published in three newspapers starting on November 3, 2021. This included the following newspapers and publishing dates:

- Chronicle Herald: November 3, 6 and 8, 2021;
- Masthead News (published monthly): November 3, 2021; and,
- Bedford Wire (published weekly): November 3, 2021.

Copies of the newspaper notices are included in Appendix B.

<sup>1</sup> <https://www.halifax.ca/home-property/garbage-recycling-green-cart/garbage-collection/otter-lake-consultation>

### 2.1.3 Social Media

Paid Facebook ads were made through HRM's Halifax Recycles Facebook page<sup>2</sup>. The ads were advertised to Facebook users that lived within 5 km of the FEP/WSF. Facebook users that clicked on the ad were brought to HRM's FEP/WSF webpage where they could access the information detailed previously. Facebook users could also comment on the posts and these comments were documented as part of this consultation.

### 2.1.4 Mail-Out

Public Notices were mailed out via Canada Post to households and businesses with a postal code within 5 km of the FEP/WSF. Notices were delivered to all houses with postal codes that have houses both within and outside of the 5 km radius. A copy of the Public Notice is provided in Appendix B.

### 2.1.5 Direct Communication

Several groups were notified directly via email by HRM including the Otter Lake Community Monitoring Committee (CMC), the Beechville Development Association (November 5, 2021), the office of the Honorable Iain Rankin (November 5, 2021) and Halifax Regional Council (November 3, 2021).

## 2.2 Public Survey

A public survey was developed in consultation with HRM and MIRROR to provide the public with the opportunity to provide feedback on issues that had come forward during previous discussions with the CMC and/or were reviewed in the Closure Review report and presented in the Amendment Application. An open opportunity was also provided to identify any new issues. A copy of the survey is included in Appendix B (PDF version that was available for download).

The intent of the public survey was to identify respondents that lived within 5 km of the FEP/WSF (e.g., Timberlea, Lakeside, Beechville, Goodwood and Prospect), consistent with requirements identified by NSECC. However, the survey was available for anyone to complete whether they lived within 5 km of the FEP/WSF or not. Respondents were asked if specific issues associated with the proposed changes to FEP/WSF operation, such as litter, birds and vectors, were of concern. If respondents indicated that they were a concern, the current and proposed mitigation measures was provided as presented in the Amendment Application. Following a review of the mitigation measures, respondents were asked if these measures addressed their concerns. If the measures did not address a respondent's concern, they were able to provide comments to elaborate. In an effort to keep the replies focused on the specific issues, 400 characters were allowed for responses. Respondents were able to provide comments for each issue presented as well as additional comments for any new items that may have not be included in the survey questions. If respondents wished to submit more detailed or lengthy responses on a

<sup>2</sup> <https://www.facebook.com/HalifaxRecycles>

specific issue, a project email address and mailing address were provided on the HRM webpage, Public Notices and in the survey itself.

The survey was available to complete online via the survey platform SurveyMonkey™. Based on feedback provided by the public, a downloadable version of the survey was provided and uploaded onto HRM's website on November 10, 2021. In addition, residents could also request a hard copy of the survey by phoning 311 and having it mailed to their address. Upon completion, the downloadable or hard copy version received in the mail could be emailed or mailed directly back to HRM. Any survey responses received via mail or email were manually input into the survey data collected via the online survey (total of seven). Mailed in survey responses were accepted past the December 3, 2021 end date of the public consultation to allow for delivery time with Canada Post.

### 2.3 Public Survey Response Analysis

The analysis of the responses to the survey was completed as per the flowchart presented in Figure 1.

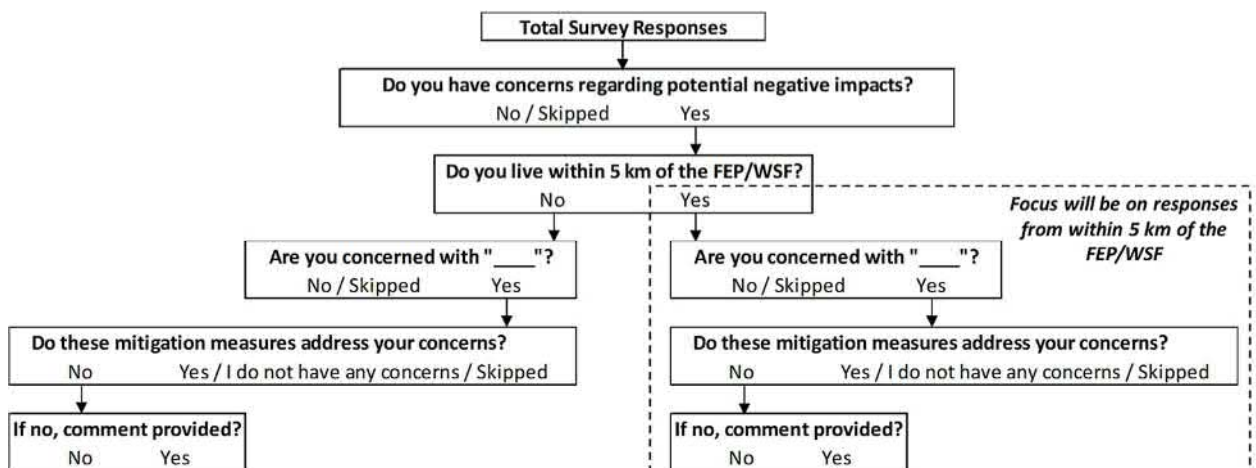


Figure 1: Data Flow Chart

Survey responses were distinguished by those who provided a postal code within 5 km of the FEP/WSF, and those that provided a postal code more than 5 km away from the FEP/WSF. The 5 km radius established for the purposes of selecting postal codes for the mail-out is presented in Figure 2. However, as certain postal codes are located both within and outside of this 5 km radius, and the entire postal code was provided with the mail-out, households outside of the 5 km radius were also mailed the survey as previously noted.

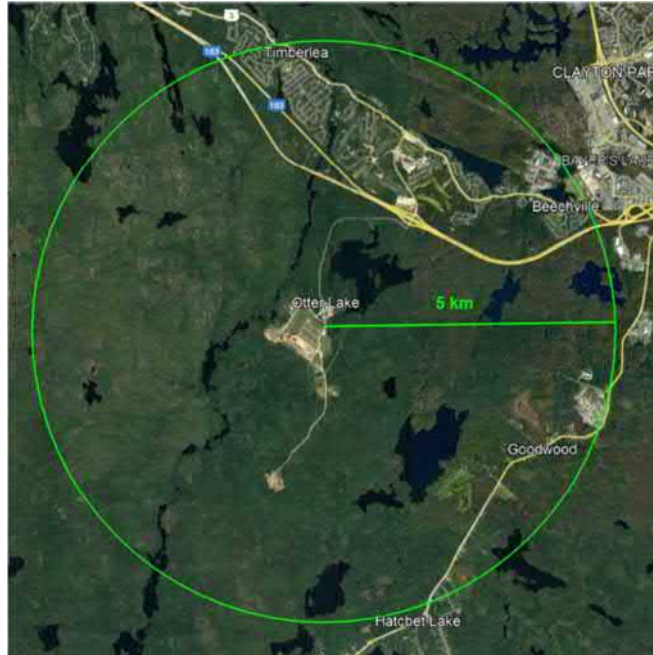


Figure 2: 5 km Survey Radius

If a respondent indicated they were within 5 km but no postal code was provided and/or if the postal code was located both within and outside of the 5 km radius, responses were considered to be within 5 km. As was previously indicated, NSECC specified the consultation target audience to be within 5 km of the FEP/WSF. While all responses were reviewed and analyzed, the discussion in Section 3.0 primarily focuses on responses within the target 5 km area.

As noted previously, respondents were prompted to indicate their specific area(s) of concern in the survey questions. If an area of concern was selected, information of the proposed mitigation measures was presented. Respondents were then prompted to indicate if the mitigation measures presented in the Amendment Application addressed their concerns. If the measures did not address a respondent's concerns they were able to provide comments to elaborate.

## 2.4 Social Media Analysis

Several comments were received on HRM's social media post by the public. These were reviewed and areas of concern have been noted in Section 3.2. It was unclear if all social media comments were from respondents within 5 km of the FEP/WSF; therefore, it was assumed that the respondents were within 5 km of the FEP/WSF. A copy of HRM's social media post is included in Appendix B.

## 2.5 Emailed and Mailed-In Analysis

Emailed and mailed-in feedback was reviewed and areas of concern have been noted in Section 3.3. If it was unclear if emailed and mailed-in feedback were from respondents within 5 km of the FEP/WSF it was assumed that the respondents were within 5 km of the FEP/WSF.

## 3.0

## Consultation Results

Responses received via digital surveys, hard copy, and emailed surveys, mailed letters, emails and social media comments are discussed in the following subsections.

## 3.1

### Survey

The following subsections highlight the results of the survey and the areas of concern that respondents indicated in their response.

## 3.1.1

#### Overall Results

Of the 1,905 surveys completed, 713 were from respondents within 5 km of the facility and 689 of those respondents indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF (see Figure 3). The remaining responses (24) from within 5 km of the facility did not have any concerns with respect to the proposed deactivation of the FEP/WSF. For respondents who were from outside of the 5 km, 1,192 provided responses and 1,127 indicated that they had concerns regarding potential negative impacts. Accordingly, 65 respondents from outside of the 5 km indicated that they had no concerns with respect to the proposed deactivation of the FEP/WSF.

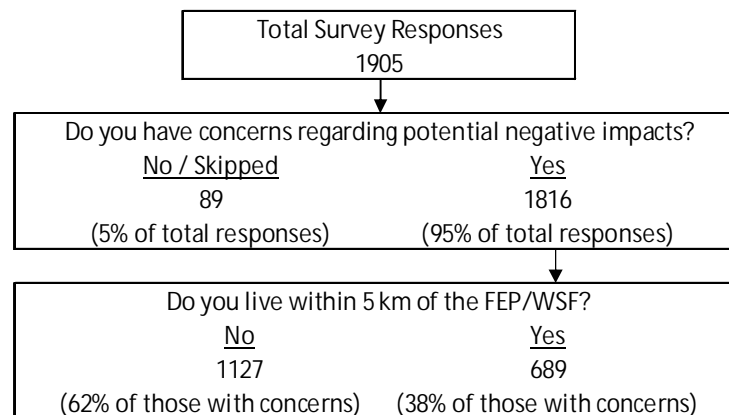


Figure 3: Overall Survey Results

A copy of survey results by respondent has been included in Appendix C organized by proximity to the FEP/WSF (within and outside of 5 km by postal code) noting that identifying information such as IP addresses, names, emails and similar data has been redacted. A summary of respondent comments have been organized in Appendix D by area of concern and proximity to the FEP/WSF (within and outside of 5 km by postal code).

The following sections summarize the responses received from respondents that noted that they had concerns regarding potential negative impacts (689 respondents within 5 km of the site and 1,127 respondents outside of 5 km). Samples of comments received from respondents have been included in each of the sections and are provided verbatim.

**3.1.2 Safety of Workers / Increased Traffic at Landfill Disposal Area**

Questions pertaining to safety of workers / increased traffic at the landfill disposal area are provided on pages 2 to 4 of the survey in Appendix B.

**3.1.2.1 Summary of Responses**

Of the 689 respondents within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 507 either did not have concerns related to safety of workers / increased traffic or indicated that their concerns were addressed through the mitigation measures presented. Of the remaining 182 that indicated the mitigation measures presented did not address their concerns, 118 respondents providing further comment. A summary of the results is presented in Figure 4.

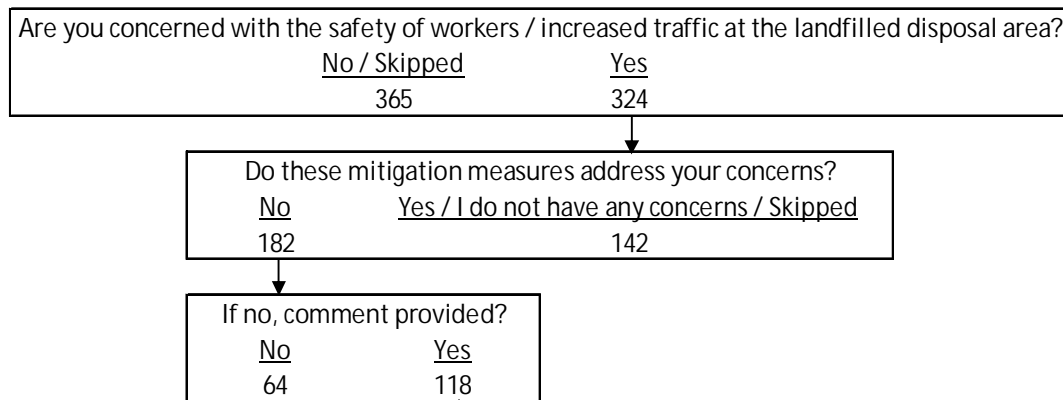


Figure 4: Survey Results Summary (Within 5 km) – Safety of Workers / Increased Traffic at the Landfill Disposal Area

For the 1,127 respondents that were not within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 864 either did not have concerns related to safety of workers / increased traffic or indicated that their concerns were addressed through the mitigation measures presented. 263 respondents indicated that the mitigation measures presented did not address their concerns.

Comments specific to the safety of workers / increased traffic at the landfill disposal area are included in Appendix D.

## 3.1.2.2

## Analysis of Detailed Responses

Comments received on the question of safety of workers / increased traffic from respondents within 5 km of the site were wide-ranging and included a significant number of responses pertaining to non-safety / traffic concerns. Of those comments related to safety of workers / increased traffic, the examples presented below are considered representative of the most common areas of concern.

- “This is going to increase large slow moving vehicles on our roads which do not need.”
- “I am still concerned that waste will not be sorted before being deposited into the landfill. Staff will be a greater risk due to more raw waste being dumped and attacking vermin, animals and birds”
- “The by-products of solid waste deposited in a landfill has adverse effects on the surrounding environment and humans living closer to landfill sites. Sacrificing human living conditions, safety and the environment for money is WRONG.”
- “I do not see how an increase in vehicles, therefore an increase in waste being dumped at this facility is warranted. I think the amount of materials processed at this site should be the same as under the current agreement and not increased”
- “We can not predict what banned substances may get into the landfill site and cause risk to workers. Removal of FEP/WSF could see return of ICI waste. Far more traffic and hazardous waste will arrive into the site”

Comments received from respondents outside of 5 km of the site were generally consistent with the comments received from respondents within the 5 km radius. Several examples of representative comments received from outside of 5 km are presented below.

- “You're stating that there will indeed be an increase of traffic. This concerns me as we travel on the Prospect road daily and the amount of garbage and waste and hazardous materials that falls off of trucks and onto the road is awful.”
- “Without a front end processor, I am worried that staff will be subjected to unsafe working conditions due to the increase in gases caused by poorly sorted waste entering the landfill. Also it's going to smell more and I wouldn't want to work in that!”

With respect to the proposed deactivation of the FEP/WSF, no off-site impacts relating to safety of workers / increased traffic have been identified or are expected. Some on-site impacts have been identified which includes an increase in waste vehicle traffic at the active disposal area. Traffic control mitigation measures include establishing rules, signage, and the use of traffic spotters. Based on the survey responses received relating to safety of workers / increased traffic, there do not appear to be areas of concern not already addressed by the mitigation measures presented in Section 6.2 of the Closure Review report, provided as part of Attachment 6B-C of the Amendment Application.



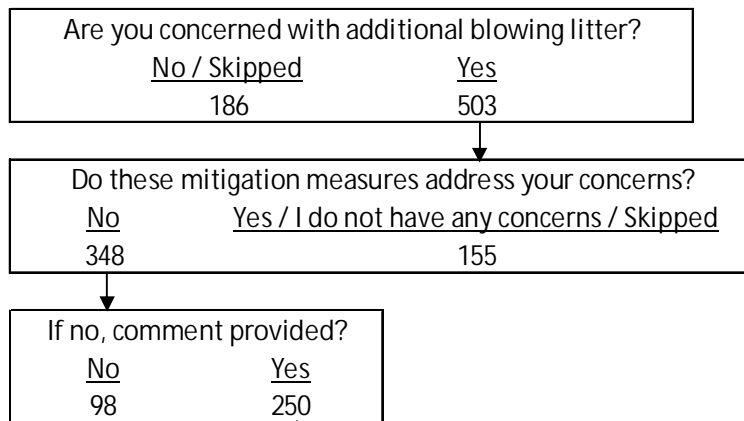
It is noted that many survey respondents believed that there would be an increase in the number of waste collection vehicles in the community which is not the case. This will be clarified through the next steps outlined in Section 4.

**3.1.3 Blowing Litter**

Questions pertaining to blowing litter are provided on pages 5 to 6 of the survey in Appendix B.

**3.1.3.1 Summary of Responses**

Of the 689 respondents within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 503 respondents indicated concerns with blowing litter and 186 respondents did not indicate any concerns with blowing litter. For the 503 respondents with concerns, 348 indicated the mitigation measures presented did not address their concerns, with 250 respondents providing further comment. A summary of the results is presented in Figure 5.



**Figure 5: Survey Results Summary (Within 5 km) – Blowing Litter**

For the 1,127 respondents that were not within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 598 either did not have concerns related to blowing litter or indicated that their concerns were addressed through the mitigation measures presented. 529 respondents indicated that the mitigation measures presented did not address their concerns.

Comments specific to blowing litter are included in Appendix D.

**3.1.3.2 Analysis of Detailed Responses**

Comments received on the question of blowing litter from respondents within 5 km of the site were wide-ranging and included a significant number of responses pertaining to non-litter concerns. Of those comments related to litter, the examples presented below are considered representative of the most common areas of concern.



- “There is always garbage on the highway and dump access road now. It will only get worse.”
- “More truck hauling garbage to site mean more garbage on the 103.”
- “Catch fencing only works if it is maintained/and the debris is routinely removed.”
- “Our winds are too strong and storms are too strong”
- “loose paper waste picked up by prevailing winds will not be curbed by fencing alone”

Comments received from respondents outside of 5 km of the site were generally consistent with the comments received from respondents within the 5 km radius. Several examples of representative comments received from outside of 5 km are presented below.

- “Are you indicating that this barrier will prevent litter from blowing over the fenced in area. With the wind that blows across that community, it is very difficult to believe that litter will be contained.”
- “There is garbage from the beginning of the Prospect Rd to the dump. This is not dealt with on a daily basis”

With respect to the proposed deactivation of the FEP/WSF, no off-site impacts due to blowing litter have been identified or are expected. Some on-site impacts have been identified which includes the increased potential for blowing litter at the landfill disposal area. Blowing litter mitigation measures include the use of additional portable litter fencing and litter cleanup efforts by staff. Based on the survey responses received relating to blowing litter, there do not appear to be areas of concern not already addressed by the mitigation measures presented in Section 6.4.1 of the Closure Review report, provided as part of Attachment 6B-C of the Amendment Application.

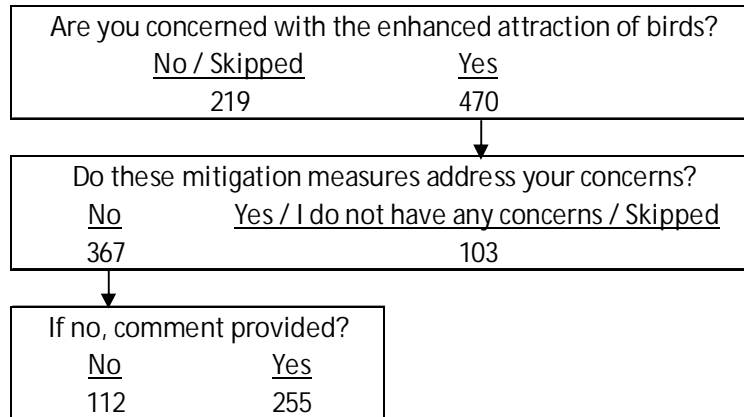
It is noted that many survey respondents believed that there would be an increase in litter in the community and on public roadways which is not the case. This will be clarified through the next steps outlined in Section 4.

#### 3.1.4 Enhanced Attraction of Birds

Questions pertaining to the enhanced attraction of birds are provided on pages 7 to 8 of the survey in Appendix B.

##### 3.1.4.1 Summary of Responses

Of the 689 respondents within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 470 respondents indicated concerns with the enhanced attraction of birds and 219 respondents did not indicate any concerns with the enhanced attraction of birds. For the 470 respondents with concerns, 367 indicated the mitigation measures presented did not address their concerns, with 255 respondents providing further comment. A summary of the results is presented in Figure 6.



**Figure 6: Survey Results Summary (Within 5 km) – Enhanced Attraction of Birds**

For the 1,127 respondents that were not within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 565 either did not have concerns related to enhanced attraction of birds or indicated that their concerns were addressed through the mitigation measures presented. 562 respondents indicated that the mitigation measures presented did not address their concerns.

Comments specific to enhanced attraction of birds are included in Appendix D.

### 3.1.4.2

#### Analysis of Detailed Responses

Comments received on the question of enhanced attraction of birds from respondents within 5 km of the site were wide-ranging and included a significant number of responses pertaining to non-bird concerns. Of those comments related to enhanced attraction of birds, the examples presented below are considered representative of the most common areas of concern.

- “Losing the Front-End Processor may increase the amount of food waste disposed of in the landfill. The smell this generates may attract more birds to the area. The measures above work now, but for the limited number of birds present, but there is no evidence that this will be enough if bird populations increase.”
- “The current management method is successful we should not change”
- “Who conducts these "measures" and how often? Even if they're done now, we have the FEP/WSF in place now too. You don't know how this will change when it's not.”
- “The bird population will increase with more access even with the measures in place.”
- “Killing or scaring birds is reactive. Pre sorting prevents organic waste in the first place which prevents bird attraction.”

Comments received from respondents outside of 5 km of the site were generally consistent with the comments received from respondents within the 5 km radius. Several examples of representative comments received from outside of 5 km are presented below.

- “Again, currently we have NO PROBLEMS with birds, rats or environmental issues. With a truck and dump program, and not using the FEP & WSF safety measures that ensure only acceptable end up in the cell as approved by HRM staff. Keep the FEP & WSF”
- “Birds are attracted to garbage , dumped garbage will just attracted”

With respect to the proposed deactivation of the FEP/WSF, no off-site impacts relating to enhanced attraction of birds have been identified or are expected. Some on-site impacts have been identified which includes a potential increase in the attraction of birds to the active disposal area. Mitigation measures include the use of control measures such as falconry services and noise makers. Based on the survey responses received relating to enhanced attraction of birds, there do not appear to be areas of concern not already addressed by the mitigation measures presented in Section 6.4.2 of the Closure Review report, provided as part of Attachment 6B-C of the Amendment Application.

It is noted that many survey respondents had questions regarding the effectiveness of mitigation measures related to the attraction of birds. This will be clarified through the next steps outlined in Section 4.

### 3.1.5 Delivery of Rodents to the Disposal Area

Questions pertaining to delivery of rodents to the disposal area are on pages 9 to 10 of the survey in Appendix B.

#### 3.1.5.1 Summary of Responses

Of the 689 respondents within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 530 respondents indicated concerns with delivery of rodents to the disposal area and 159 respondents did not indicate any concerns with delivery of rodents to the disposal area. For the 530 respondents with concerns, 462 indicated the mitigation measures presented did not address their concerns, with 359 respondents providing further comment. A summary of the results is presented in Figure 7.

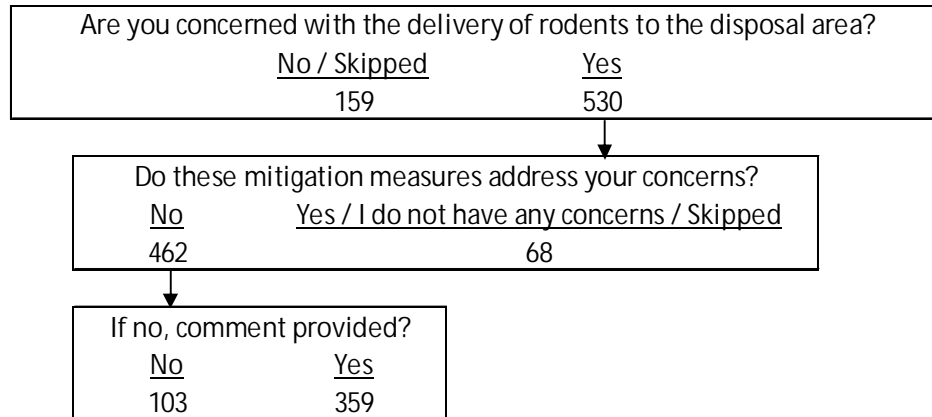


Figure 7: Survey Results Summary (Within 5 km) – Delivery of Rodents to the Disposal Area

For the 1,127 respondents that were not within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 438 either did not have concerns related to delivery of rodents to the disposal area or indicated that their concerns were addressed through the mitigation measures presented. 689 respondents indicated that the mitigation measures presented did not address their concerns.

Comments specific to the delivery of rodents to the disposal area are included in Appendix D.

### 3.1.5.2

#### Analysis of Detailed Responses

Comments received on the question of rodents at the disposal area from respondents within 5 km of the site were wide-ranging and included a significant number of responses pertaining to non-rodent concerns. Of those comments related to rodents, the examples presented below are considered representative of the most common areas of concern.

- “Don’t think baiting rodents will help.”
- “Rodents cannot be eliminated with a “safe” baiting program; they can only be somewhat controlled as new animals will replace ones that die. More exposed wet/edible garbage will bring in more replacements.”
- “Living in the area I have seen an increase in the number of rodents. Changes in the landfill will only make it worse.”
- “it will generally increase rodents in the larger area”
- “We already have issues with rodents in the Timberlea area. Changing the way of dealing with waste will just add to the problem.”

Comments received from respondents outside of 5 km of the site were generally consistent with the comments received from respondents within the 5 km radius. Several examples of representative comments received from outside of 5 km are presented below.

- “Medium risk is not acceptable. Not when it comes to rodents and increased organic waste.”
- “Without proper sorting there will be more for for rodents. I don’t believe your above mentioned solutions will handle the problem.”

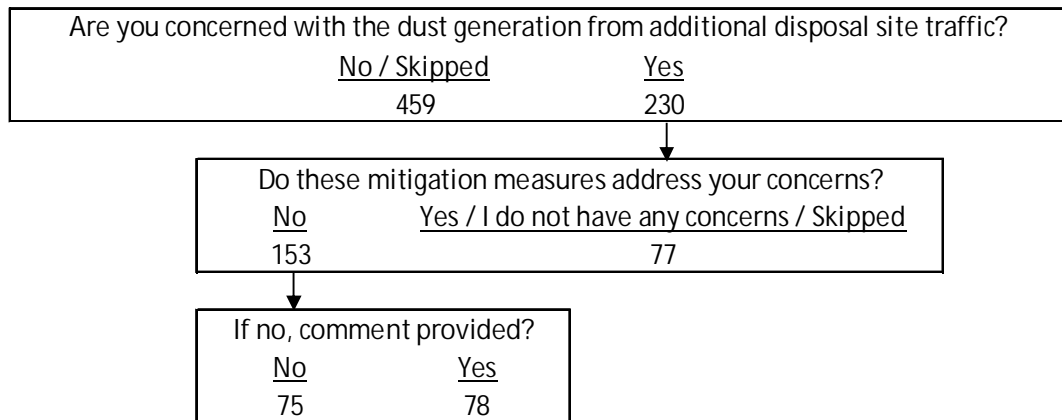
With respect to the proposed deactivation of the FEP/WSF, no off-site impacts relating to rodents have been identified or are expected. Some on-site impacts have been identified which includes a potential increase in delivery of rodents to the active disposal area. Mitigation measures include the implementation of a baiting program for rodents at the disposal area. Based on the survey responses received relating to rodents, there do not appear to be areas of concern not already addressed by the mitigation measures presented in Section 6.4.2 of the Closure Review report, provided as part of Attachment 6B-C of the Amendment Application.

**3.1.6 Dust Generation for Additional Disposal Site Traffic**

Questions pertaining to dust generation for additional disposal site traffic are provided on pages 11 to 12 of the survey in Appendix B.

**3.1.6.1 Summary of Responses**

Of the 689 respondents within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 230 respondents indicated concerns with dust generation for additional disposal site traffic and 459 respondents did not indicate any concerns with dust generation for additional disposal site traffic. For the 230 respondents with concerns, 153 indicated the mitigation measures presented did not address their concerns, with 78 respondents providing further comment. A summary of the results is presented in Figure 8.



**Figure 8: Survey Results Summary (Within 5 km) – Dust Generation for Additional Disposal Site Traffic**



For the 1,127 respondents that were not within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 894 either did not have concerns with dust generation for additional disposal site traffic or indicated that their concerns were addressed through the mitigation measures presented. 233 respondents indicated that the mitigation measures presented did not address their concerns.

Comments specific to dust generation for additional disposal site traffic are included in Appendix D.

### 3.1.6.2 Analysis of Detailed Responses

Comments received on the question of dust generation from respondents within 5 km of the site were wide-ranging and included a significant number of responses pertaining to non-dust concerns. Of those comments related to dust generation, the examples presented below are considered representative of the most common areas of concern.

- “More vehicles more dust!”
- “no amount of dust suppression will fully compensate for the significantly increased traffic going to the face of the cell.”
- “The chemicals used to prevent mud and dust will still have a negative effect on air quality.”
- “Current dust levels are high, has to been unhealthy for any additional increases.”
- “Increase of traffic due to closure of FEP/WSF will necessitate an increase in the moving of earth/dirt to cover increased waste product that was previously screened by the FEP/WSF”

Comments received from respondents outside of 5 km of the site were generally consistent with the comments received from respondents within the 5 km radius. Several examples of representative comments received from outside of 5 km are presented below.

- “All these mitigation measures are NOT ENOUGH for the increased activity.”
- “Increased trucking = increased problems. More dust, more garbage on the roads/woods/ditches, more accidents, more wear and tear the list goes on”

With respect to the proposed deactivation of the FEP/WSF, no on or off-site impacts relating to dust generation have been identified or are expected. Based on the survey responses received relating to dust generation, there do not appear to be areas of concern not already addressed by the mitigation measures presented in Section 6.4.3 of the Closure Review report, provided as part of Attachment 6B-C of the Amendment Application.

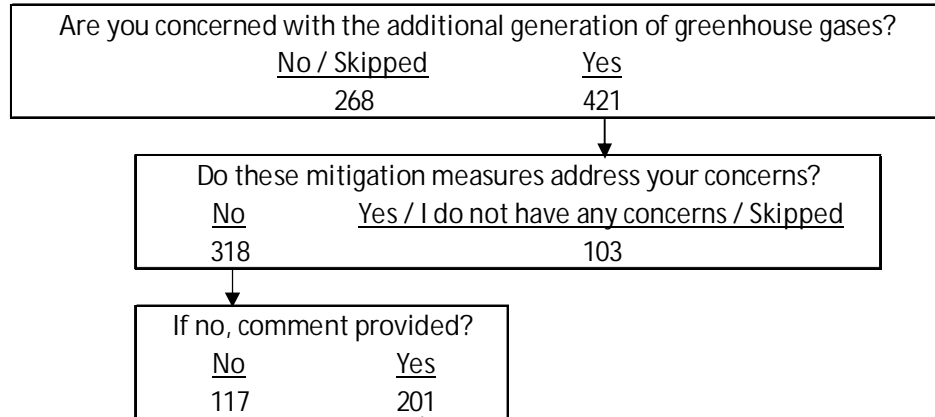
### 3.1.7 Additional Generation of Greenhouse Gases

Questions pertaining to the additional generation of greenhouse gases are provided on pages 13 to 14 of the survey in Appendix B.

3.1.7.1

Summary of Responses

Of the 689 respondents within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 421 respondents indicated concerns with the additional generation of greenhouse gases and 268 respondents did not indicate any concerns with the additional generation of greenhouse gases. For the 421 respondents with concerns, 318 indicated the mitigation measures presented did not address their concerns, with 201 respondents providing further comment. A summary of the results is presented in Figure 9.



**Figure 9: Survey Results Summary (Within 5 km) – Additional Generation of Greenhouse Gases**

For the 1,127 respondents that were not within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 664 either did not have concerns with the additional generation of greenhouse gases or indicated that their concerns were addressed through the mitigation measures presented. 463 respondents indicated that the mitigation measures presented did not address their concerns.

Comments specific to the additional generation of greenhouse gases are included in Appendix D.

3.1.7.2

Analysis of Detailed Responses

Comments received on the question of GHG generation from respondents within 5 km of the site were wide-ranging and included a significant number of responses pertaining to non-GHG generation concerns. Of those comments related to GHG generation, the examples presented below are considered representative of the most common areas of concern.

- “by deactivating the FEP facility there is a greater chance that methane activity will increase due to the additional organic matter being added to the landfill.”
- “I am not confident that removing the FEP will not affect gas emission.”
- “Rather than saying that it is okay to allow organic material into the landfill because the net amount of greenhouse gases produced is less than the electricity used to separate the organic



materials, you should be consider greener sources of energy for that separation and keep the organics out of the landfill. This will allow even less greenhouse gas emissions.”

- “By deactivating the FEP and WSF more organic material will enter the landfill and cause more greenhouse effect”
- “Removal of the FEP/WSF will cause an increase of methane gas in the landfill. We need to take measures to reduce methane gas wherever possible”

Comments received from respondents outside of 5 km of the site were generally consistent with the comments received from respondents within the 5 km radius. Several examples of representative comments received from outside of 5 km are presented below.

- “The key word is "greatly" it is still going to increase greenhouse gases. You are going in the wrong direction”
- “The whole country is going in the direction of reducing methane gas. This will increase substantially the amount of methane gas.”

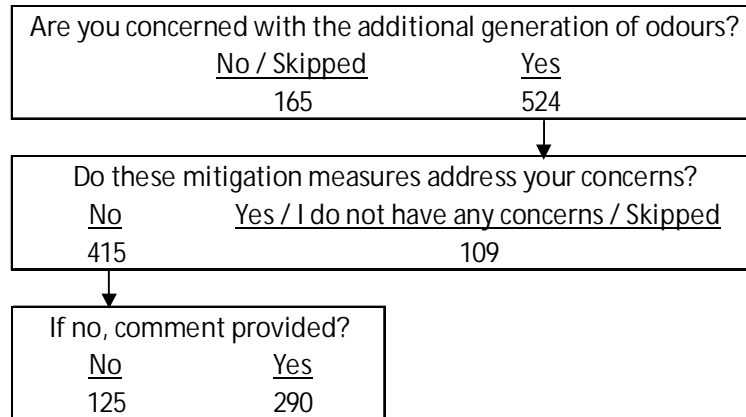
With respect to the proposed deactivation of the FEP/WSF, it is anticipated that potential increases in GHG generation will be offset by reduced electricity consumption in the FEP/WSF. Based on the survey responses received relating to GHG generation, there do not appear to be areas of concern not already addressed by the mitigation measures presented in the HRM Staff Report, provided as part of Attachment 6B-C of the Amendment Application.

### 3.1.8 Additional Generation of Odours

Questions pertaining to the additional generation of odours are provided on pages 15 to 16 of the survey in Appendix B.

#### 3.1.8.1 Summary of Responses

Of the 689 respondents within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 524 respondents indicated concerns with the additional generation of odours and 165 respondents did not indicate any concerns with the additional generation of odours. For the 524 respondents with concerns, 415 indicated the mitigation measures presented did not address their concerns, with 290 respondents providing further comment. A summary of the results is presented in Figure 10.



**Figure 10: Survey Results Summary (Within 5 km) – Additional Generation of Odours**

For the 1,127 respondents that were not within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 539 either did not have concerns with the additional generation of odours or indicated that their concerns were addressed through the mitigation measures presented. 588 respondents indicated that the mitigation measures presented did not address their concerns.

Comments specific to the additional generation of odours are included in Appendix D.

### 3.1.8.2

#### Analysis of Detailed Responses

Comments received on the question of odours from respondents within 5 km of the site were wide-ranging and included a significant number of responses pertaining to non-odour concerns. Of those comments related to odours, the examples presented below are considered representative of the most common areas of concern.

- “Measures will reduce odours but I am confident it will not remove all odours.”
- “Without the added protection of the FEP/WSF these mitigation measures are no guarantee. Organic waste material should not be buried in a landfill. Keep the FEP/WSF active.”
- “Existing measures are satisfactory for stabilized waste; there is no evidence that they will be successful if the waste isn't stabilized.”
- “Works good now with occasional odours. However we have no guarantee our site won't stink like others that do not have an FEP/WSF. Things work great now. “LEAVE OTTER LAKE ALONE”
- “The removal of the FEP/WSF could potentially cause more odor from increased organic waste. We don't live close to the landfill but spend time in residential areas near the landfill.”

Comments received from respondents outside of 5 km of the site were generally consistent with the comments received from respondents within the 5 km radius. Several examples of representative comments received from outside of 5 km are presented below.

- “Because when I drive by the site every day I can smell it. It is not being effectively managed now.”
- “It smells NOW! Some days it just wafts through greenwood heights, timberlea village etc. It is disgusting. It also can be smelt in prospect. If it isn't fixed NOW it can only get worse.”

With respect to the proposed deactivation of the FEP/WSF, no on or off-site impacts relating to odours have been identified or are expected. Based on the survey responses received relating to odours, there do not appear to be areas of concern not already addressed by the mitigation measures presented in Section 6.5 of the Closure Review report, provided as part of Attachment 6B-C of the Amendment Application.

It is noted that many survey respondents were not convinced that odour mitigation measures would be effective without the FEP/WSF. This will be clarified through the next steps outlined in Section 4.

**3.1.9 Impact to Groundwater Quality**

Questions pertaining to the impact to groundwater quality are provided on pages 17 to 18 of the survey in Appendix B.

**3.1.9.1 Summary of Responses**

Of the 689 respondents within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 436 respondents indicated concerns with the impact to groundwater quality and 253 respondents did not indicate any concerns with the impact to groundwater quality. For the 436 respondents with concerns, 326 indicated the mitigation measures presented did not address their concerns, with 188 respondents providing further comment. A summary of the results is presented in Figure 11.

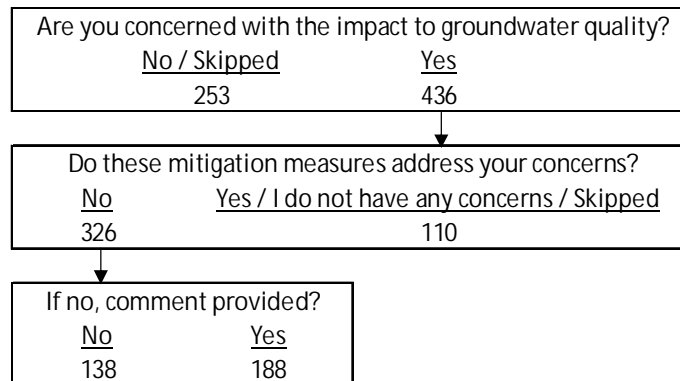


Figure 11: Survey Results Summary (Within 5 km) – Impact to Groundwater Quality



For the 1,127 respondents that were not within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 633 either did not have concerns with the impact to groundwater quality or indicated that their concerns were addressed through the mitigation measures presented. 494 respondents indicated that the mitigation measures presented did not address their concerns.

Comments specific to the impact to groundwater quality are included in Appendix D.

### 3.1.9.2 Analysis of Detailed Responses

Comments received on the question of groundwater quality from respondents within 5 km of the site were wide-ranging and included a significant number of responses pertaining to non-groundwater concerns. Of those comments related to groundwater, the examples presented below are considered representative of the most common areas of concern.

- “Increased organic matter in the landfill will cause an increase in leachate in ground water”
- “How quickly would it be known if these protections are not working properly? Is it worth risking our groundwater? It is not to me”
- “Removing the front end processor will result in wrong materials going into the landfill and even hazardous wastes which could get into the ground water”
- “Still concerned with the quality of groundwater no matter what your promise is.”
- “If you are no longer monitoring what is going in the landfill you cannot guarantee continued protection of ground water.”

Comments received from respondents outside of 5 km of the site were generally consistent with the comments received from respondents within the 5 km radius. Several examples of representative comments received from outside of 5 km are presented below.

- “Monitoring for issues isn't the only solution. Working proactively to keep the water safe has to be the highest priority. It's next to a lake which could then carry contaminants into the local ground water. This should be a major concern for all parties involved.”
- “You cannot tell me that this does not leak or experience unfortunate incidence where protocols are breached. The community does not trust your imposed safety measures.”

With respect to the proposed deactivation of the FEP/WSF, no on or off-site impacts relating to groundwater have been identified or are expected. Based on the survey responses received relating to groundwater, there do not appear to be areas of concern not already addressed by the mitigation measures presented in Section 6.6 and 6.8 of the Closure Review report, provided as part of Attachment 6B-C of the Amendment Application.

It is noted that many survey respondents were concerned with groundwater protection without the operation of the FEP/WSF. The FEP/WSF does not provide any protection with regards to groundwater quality. This will be clarified through the next steps outlined in Section 4.

**3.1.10** Impact to Surface Water Quality

Questions pertaining to the impact to surface water quality are provided on pages 19 to 20 of the survey in Appendix B.

**3.1.10.1** Summary of Responses

Of the 689 respondents within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 386 respondents indicated concerns with the impact to surface water quality and 303 respondents did not indicate any concerns with the impact to surface water quality. For the 386 respondents with concerns, 290 indicated the mitigation measures presented did not address their concerns, with 154 respondents providing further comment. A summary of the results is presented in Figure 12.

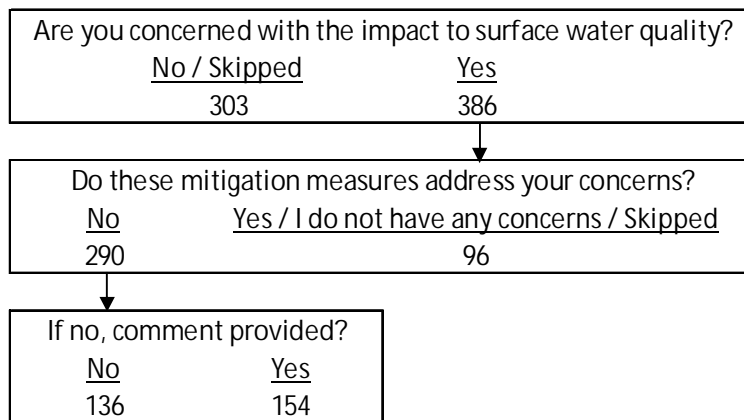


Figure 12: Survey Results Summary (Within 5 km) – Impact to Surface Water Quality

For the 1,127 respondents that were not within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 709 either did not have concerns with the impact to surface water quality or indicated that their concerns were addressed through the mitigation measures presented. 418 respondents indicated that the mitigation measures presented did not address their concerns.

Comments specific to the impact to surface water quality are included in Appendix D.

## 3.1.10.2

## Analysis of Detailed Responses

Comments received on the question of surface water quality from respondents within 5 km of the site were wide-ranging and included a significant number of responses pertaining to non-surface water concerns. Of those comments related to surface water, the examples presented below are considered representative of the most common areas of concern.

- “Increased organic matter in the landfill will cause an increase in surface water contamination surface”
- “Otter Lake has an international reputation for its waste management. To date, there have been no issues with run-off etc but why tamper with a successful system?”
- “The landfill should already be decommissioned. Then we wouldn't need to worry about the impact to surface water quality.”
- “How often is water testing completed on water runoff and how often is groundwater tested?”
- “What about the animals that need the water to survive. I don't believe any of the information that is being touted by the city to get to their end game”

Comments received from respondents outside of 5 km of the site were generally consistent with the comments received from respondents within the 5 km radius. Several examples of representative comments received from outside of 5 km are presented below.

- “I have concerns that less front end screening of garbage could allow more hazardous waste to slip into the landfill and that it could eventually contaminate Nine Mile River and its downstream lakes.”
- “Wild animals, birds and pets drink from puddles and streams. Eventually surface water seeps into the ground making its way into wells.”

With respect to the proposed deactivation of the FEP/WSF, no on or off-site impacts relating to surface water have been identified or are expected. Based on the survey responses received relating to surface water, there do not appear to be areas of concern not already addressed by the mitigation measures presented in Section 6.7 and 6.8 of the Closure Review report, provided as part of Attachment 6B-C of the Amendment Application.

It is noted that many survey respondents were concerned with surface water protection without the operation of the FEP/WSF. The FEP/WSF does not provide any protection with regards to surface water. This will be clarified through the next steps outlined in Section 4.

## 3.1.11

## Honouring the Original Community Agreement

Questions pertaining to honouring the original community agreement are provided on pages 21 to 22 of the survey in Appendix B.

3.1.11.1

Summary of Responses

Of the 689 respondents within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 502 respondents indicated concerns with honouring the original Community Agreement and 187 respondents did not indicate any concerns with honouring the original Community Agreement. For the 502 respondents with concerns, 425 indicated the mitigation measures presented did not address their concerns, with 299 respondents providing further comment. A summary of the results is presented in Figure 13.

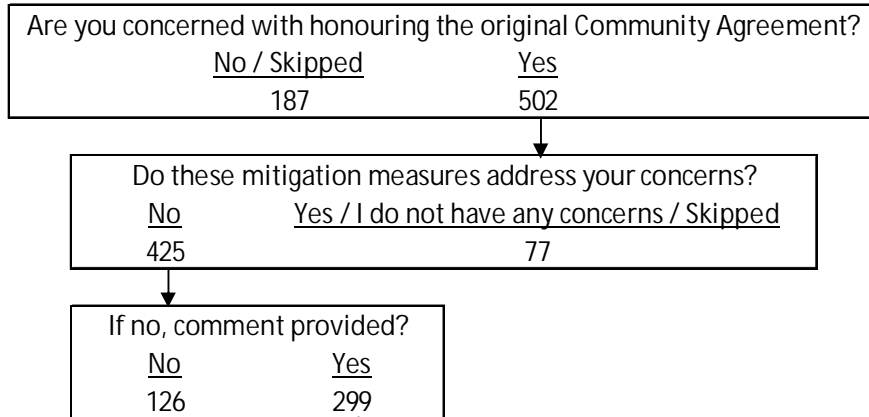


Figure 13: Survey Results Summary (Within 5 km) – Honouring the Original Community Agreement

For the 1,127 respondents that were not within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 483 either did not have concerns with honouring the original Community Agreement or indicated that their concerns were addressed through the mitigation measures presented and 644 respondents indicated that the mitigation measures presented did not address their concerns.

Comments specific to honouring the original community agreement are included in Appendix D.

3.1.11.2

Analysis of Detailed Responses

Comments received on the question of honouring the original community agreement from respondents within 5 km of the site were wide-ranging and included a significant number of responses pertaining to other concerns. Of those comments related to honouring the original community agreement, the examples presented below are considered representative of the most common areas of concern.

- “The FEP & WSF were critical components of the contract the communities accepted. The tactics used by HRM in attempt to remove the FEP & WSF are abhorrent and not in good faith. The format of this "survey" is a disgusting reminder of the lengths policy makers will take.”
- “Removing the front end processor is against the agreement that the communities made with the HRM. The agreement stipulates that only ‘Acceptable Waste’ shall be landfilled, this will not be able to be monitored without the front end processing”

- “You need to honor your agreement”
- “The original agreement and program should be honored and followed to ensure compliance with the hosting agreement. Even though the green cart program is in place this should be looked at as a multiple barrier approach to maintain and perhaps enhance the protection measures for the landfill.”
- “I believe that the agreement reached in 1999 addressed many concerns of those that live close to Otter Lake and that by trying to invoke perceived loopholes in order to bring major changes to an agreement is unacceptable. The original agreement and its intent should be respected, if not it brings HRMs credibility in question.

Comments received from respondents outside of 5 km of the site were generally consistent with the comments received from respondents within the 5 km radius. Several examples of representative comments received from outside of 5 km are presented below.

- “Don't see how the arguments relate to honouring an agreement. If you wish to change the terms of an agreement it would seem necessary to get the agreement of all parties. I do not believe this to be the case.”
- “the agreement was established for a reason ..no enough information has been presented to the public for this change to take place ....”

There is concern that removing the FEP/WSF will violate the original agreement between HRM and the Halifax Waste/Resource Society (HWRS). This agreement stipulates that only “acceptable waste” shall be landfilled and further defines that waste, including waste that is to be biostabilized through the FEP/WSF. At the time of this agreement (1999), only 5% of municipal waste was diverted from landfill disposal and it was always envisioned that the FEP/WSF would be scaled down as source separation and diversion improved. Since then, HRM has become a national leader in diverting material from landfill disposal due to the success of source separation programs which have significantly reduced organic and recyclable materials from landfill disposal. Most of the waste currently delivered to and disposed of at Otter Lake meets the “acceptable waste” requirement and there is no benefit or further community protection in biostabilizing the waste prior to landfilling. Based on this, claims that HRM is not honouring the original agreement are not considered accurate as the agreement speaks to ensuring only “acceptable waste” enters the landfill. It is clear based on responses that further efforts, including a combination of education, and communication with the community, is required to improve understanding of landfill operations, positive impacts of source separations initiatives, and understanding the original agreement. This will be clarified through the next steps outlined in Section 4.

### 3.1.12 Inability to Reactivate the FEP/WSF

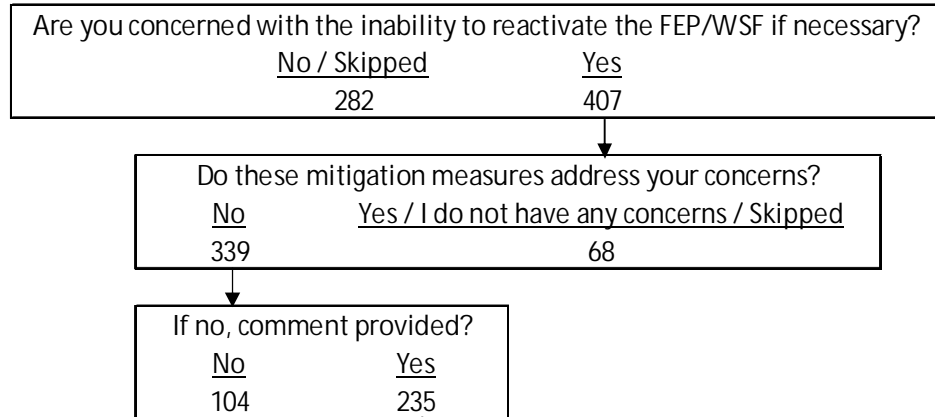
Questions pertaining to the inability to reactivate the FEP/WSF are provided on pages 23 to 25 of the survey in Appendix B.



3.1.12.1

Summary of Responses

Of the 689 respondents within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 407 respondents indicated concerns with the inability to reactivate the FEP/WSF and 282 respondents did not indicate any concerns with the inability to reactivate the FEP/WSF. Of the 407 respondents with concerns, 339 indicated the mitigation measures presented did not address their concerns, with 235 respondents providing further comment. A summary of the results is presented in Figure 14.



**Figure 14: Survey Results Summary (Within 5 km) – Inability to Reactivate the FEP/WSF**

For the 1,127 respondents that were not within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 645 either did not have concerns with the inability to reactivate the FEP/WSF or indicated that their concerns were addressed through the mitigation measures presented. 482 respondents indicated that the mitigation measures presented did not address their concerns.

Comments specific to the inability to reactivate the FEP/WSF are included in Appendix D.

3.1.12.2

Analysis of Detailed Responses

Comments received on the question of FEP/WSF reactivation from respondents within 5 km of the site were wide-ranging and included a significant number of responses pertaining to other concerns. Of those comments related to FEP/WSF reactivation, the examples presented below are considered representative of the most common areas of concern.

- “To have the system in standby kind of show that everyone currently do not know the total degree of impact the deactivation will have. Giving more reason to keep the FEP/WSF in operation.”
- “I am less concerned with the ability and more concerned with the willingness of HRM Council to restart it even if that would be in the best interests of area residents.”

- “I don't have confidence in the sincerity of a biased report, written with the purpose of justifying deactivation of this part of the facility. The residents of this area were promised by the council of the day that front end sorting would be a permanent part of the Otter Lake landfill.”
- “The damage that can occur will be done reactivation only proves you shouldn't have deactivated it. leaving it as a reactive plan is not OK. We need to be proactive”
- “To have the system in standby kind of show that everyone currently do not know the total degree of impact the deactivation will have. Giving more reason to keep the FEP/WSP in operation”

Comments received from respondents outside of 5 km of the site were generally consistent with the comments received from respondents within the 5 km radius. Several examples of representative comments received from outside of 5 km are presented below.

- “Once this is removed, HRM will never agree to spend the money to put it back in place. They will have spent it on the Cogswell Interchange project by then. We all know that once this program is gone, we will be told we just have to live with it. Rather than pay someone to create these surveys, why not spend some money keeping the area clean and presentable since it already fails in those areas.”
- “Once the change is made i am not confident govt would ever decide to reberse it. This new plan is completely unacceptable”

With respect to the proposed deactivation of the FEP/WSF, no on or off-site impacts relating to the inability to reactivate the FEP/WSF have been identified or are expected. Based on the survey responses received relating to the inability to reactivate the FEP/WSF, there do not appear to be areas of concern not already addressed by placing the facilities in stand-by mode and maintaining them in an operable state should it be decided that the facilities be reactivated as identified in Attachment 6B-C of the Amendment Application.

### 3.1.13 Other Items Related to the Proposed Deactivation of the FEP/WSF

Questions pertaining to other items related to the proposed deactivation of the FEP/WSF are provided on pages 25 of the survey in Appendix B.

#### 3.1.13.1 Summary of Responses

Of the 689 respondents within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 279 respondents indicated concerns with other items related to the proposed deactivation of the FEP/WSF and 410 respondents did not indicate any concerns with other items related to the proposed deactivation of the FEP/WSF. Of the 279 respondents that indicated they had concerns with other items with respect to the proposed deactivation of the FEP/WSF, 204 respondents providing a comment. A summary of the results is presented in Figure 15.

Are you concerned with other items with respect to the proposed deactivation of the Otter Lake FEP/WSF?	
<u>No / Skipped</u>	<u>Yes</u>
410	279

↓

If yes, comment provided?	
<u>Yes</u>	<u>No</u>
204	75

Figure 15: Survey Results Summary (Within 5 km) – Other Items with Respect to the Proposed Deactivation of the FEP/WSF

For the 1,127 respondents that were not within 5 km of the site that indicated that they had concerns with respect to the proposed deactivation of the FEP/WSF, 801 either did not have concerns with other items related to the proposed deactivation of the FEP/WSF or did not provide any further comments. 326 respondents indicated that they had concerns with other items.

Comments specific to other items with respect to the proposed deactivation of the FEP/WSF are included in Appendix D.

### 3.1.13.2

#### Analysis of Detailed Responses

Of those comments received in the Other Items question, the examples presented below are considered representative of the most common areas of concern from respondents within 5 km of the site.

- “The FEP/WSP currently works to reduce waste that isn't suppose to be dumped in the first place. The environment does not have a price tag and all measures should be used to protect it and its residents . The FEP should be kept as per agreement.”
- “This was a very biased survey that most HRM residents don't care about as long as it keeps the landfill out of their back yards, therefore this survey should have only been sent to the residents in the surrounding area within 5 Klms.”
- “This changed is only targeted at saving money. There is no good reason to deactivate FEP/WSF. HRM should be leaders in this area, not go backwards.”
- “Leave it as is or decommission the entire site. It's time for some other area to take a turn.”
- “Overall this is reverting on a process that is working and is effective. There is not outline in the plan as to who will be monitoring and where the oversight lies. Further clarification of how changes will be analyzed need to be communicated. Overall we seem to be moving backwards.”

Comments received from respondents outside of 5 km of the site were generally consistent with the comments received from respondents within the 5 km radius. Several examples of representative comments received from outside of 5 km are presented below.

- “If HRM proceeds with its plan despite its original commitment and citizen's opposition, it will be unable to convince any other community to host a landfill in the future, when this one is closed. HRM would have demonstrated that any commitment they make are not worth much. It might cost HRM a lot in the future for the sake of "saving" a couple million now.”
- “I have no faith in the Facility's management or HRM Council to look after the interests of my area. By adding organics material to the landfill, you are reducing the useful life of the site. How long do you intend to operate this landfill, 40 years like the Sackville landfill?”

With respect to the proposed deactivation of the FEP/WSF, no on or off-site impacts relating to additional concerns identified by respondents have been identified or are expected.

### 3.2 Social Media

The Facebook ad was viewed 142,901 times during the advertised period. The ad led to 957 visits to HRM's webpage where visitors were invited to participate in the survey. Twenty-six comments were received on the social media post by the public. These comments have been included in Appendix E noting that identifying information such as names and profile pictures have been redacted. Most of the comments received on the social media post were regarding the survey, honouring the community agreement, and disagreement with the proposed changes to the FEP/WSF operation.

### 3.3 Emailed and Mailed-In Feedback

In total, there were 33 emails sent to [contactus@311.halifax.ca](mailto:contactus@311.halifax.ca) or [otterlake@halifax.ca](mailto:otterlake@halifax.ca). Two letters were sent to Solid Waste Resources, PO Box 1749, Halifax, NS, B3J 3A5. Copies of each email and the letters are included in Appendix F. Several of these emails were from the same individual(s) and/or replies to previous emails. Over 20 of the emails and letters indicated disapproval with the proposed changes to the FEP/WSF operations. Several of these emails and letters also commented on honouring the original community agreement.

Several of the letters requested additional information (e.g., link to survey and/or request to speak with HRM staff).

### 3.4 Otter Lake Community Monitoring Committee Campaign

The CMC ran an independent campaign to the public consultation initiated by HRM and MIRROR Nova Scotia that conveyed some inaccurate information with regards to deactivating the FEP/WSF which may have influenced the results through a review of public comments.

Example of survey responses related to the independent CMC campaign included:

- “My understanding is these mitigation measures are going to be decreased as per the CMCIer”
- “My understanding from the CMC is these measures will not work without the FEP & WSF.”

HRM and MIRROR Nova Scotia have met its obligations to consult the CMC. This is outlined in the Community Engagement section of the HRM staff report<sup>3</sup>, included in the application to NSECC to deactivate the FEP/WSF, and summarized below:

- HRM staff announced at the CMC meeting held on November 19, 2020 that MIRROR Nova Scotia and HRM were pursuing deactivating the FEP/WSF and requested the opportunity to engage the CMC;
- On January 21, 2021 HRM staff, Dillon, and MIRROR Nova Scotia met with the CMC to review deactivating the FEP/WSF. Dillon presented a slide deck that summarized the findings of their FEP/WSF Closure Review report. CMC board members asked a number of clarifying questions with respect to the Dillon report which were answered. The CMC recorded the consultation session; and
- HRM staff and the CMC exchanged letters which outlined concerns and mitigation measures related to the FEP/WSF deactivation. These letters are included in the HRM staff report in Attachments C, D, E, and F.

In addition to the consultation completed by HRM staff and MIRROR Nova Scotia, the CMC has been kept informed with regards to the approval amendment application process, as outlined below:

- The CMC was provided a copy of the application to deactivate the FEP/WSF submitted to NSECC on September 7, 2021 (the application was submitted on August 26, 2021);
- The CMC was provided a copy of the notice from NSECC to conduct public consultation on October 8, 2021 (the notice was received by HRM/MIRROR Nova Scotia on September 23, 2021);
- HRM presented an overview of the planned public consultation plan at the CMC meeting held on October 21, 2021; and
- The CMC was provided a copy of the notice of public consultation on October 29, 2021.

<sup>3</sup> <https://www.halifax.ca/sites/default/files/documents/city-hall/regional-council/210720cow05.pdf>

## Next Steps

HRM has indicated that they will update HRM's project website and make available to the public information previously shared (e.g., Staff Report, Closure Review Report), as well as the following:

- Link to this Public Consultation Report;
- Information identified in **Section 3** through the analysis of public consultation responses (see below); and,
- Q&As related to this report and the status of the regulatory process.

Notifications informing the public of this information will be posted in some of the same media outlets by HRM that were used for the public consultation notification. Information identified in Section 3 that HRM has indicated will be provided on the project website will include the following:

- Information around a perceived increase in waste collection vehicle traffic off-site and in the local communities as deactivating the FEP/WSF will not result in any off-site vehicle traffic;
- Information regarding the concern of increased litter off-site as deactivating the FEP/WSF will not result in any off-site litter including specifically along Highway 103. Additional information will be included on routine Highway 103 litter cleanups efforts conducted by HRM;
- Information regarding odour mitigations measures as deactivating the FEP/WSF is not anticipated to cause any on-site or off-site odour issues. Best practices, such as the use of the landfill gas collection and treatment system, will continue to be employed at the site and are the primary means to mitigate odours;
- Information related to groundwater and surface water quality mitigation measures as the FEP/WSF's operational objective was not on protecting ground water or surface water resources;
- Information on mitigation measures related to the attraction of birds. The deactivation of the FEP/WSF is anticipated to have some on-site impact; however, no off-site impact including to the local communities; and,
- Information related to honouring the original community agreement.

## Conclusions

Between November 3, 2021 and December 6, 2021 public consultation on the proposed changes to the FEP/WSF was completed. In total, from within 5 km of the site, there were 713 survey responses (689 respondents indicated concerns with respect to the proposed deactivation of the FEP/WSF and 24 respondents indicated no concerns). From within 5 km of the site there were also two letters received, 33 emails received and 26 social media comments. A further 1,192 survey responses (1,127 with concerns regarding potential negative impacts with respect to the proposed deactivation of the FEP/WSF and 65 with no concerns) were received from outside of 5 km of the site which included seven hard copy survey respondents (mailed and emailed).

Based on Dillon's review, the survey responses did not identify any new areas of risk or potential concern beyond those presently identified and addressed in the Amendment Application to NSECC. While some respondents had no concerns, the majority had concerns with deactivating the FEP/WSF including echoing the potential risks that are presently addressed through operational and mitigation measures suggested in the Amendment Application.

Concerns raised by residents within 5 km of the site were similar to those residents who lived outside of the 5 km radius. Concerns raised by residents were related to items such as the following:

- Waste collection vehicle traffic;
- Litter;
- Odours;
- Groundwater and surface water quality;
- Attraction of birds; and,
- Honouring the original agreement.

It is noted that the CMC ran an independent campaign to the public consultation initiated by HRM and MIRROR Nova Scotia that conveyed some inaccurate information with regards to deactivating the FEP/WSF which may have influenced the results through a review of public comments.

Regardless, HRM and MIRROR Nova Scotia have indicated that they take these concerns very seriously and believe the potential risks associated with deactivating the FEP/WSF can be mitigated through the measures suggested in the Amendment Application. Based on the results of this public consultation, and in response to the information gathered, HRM has indicated that further public communication activities will be completed. This will include an update to the HRM project website to provide a link to this Public Consultation Report, information identified through the analysis of the public consultation responses, Q&As related to this report and the status of the regulatory process.