

CSRD Meeting
April 18th, 2024

Re: SPA HILLS COMPOSTING FACILITY
Presenter: Pat Peebles

#1 HISTORY

On June 17, 2009 an open house was held in the community to inform residents of the Spa Hills Farm project and identify potential issues of environmental concern. The original document titled 'Key Factors' (**"Article A"**) was presented. This document stated the following:

- Only local slaughterhouse waste will be processed.
- Only class A" compost will be produced.
- Composting will be indoors under cover with roof and walls on all four sides.
- Runoff will be collected in a tank and recycled.
- Finished compost will be applied to Spa Hills Farms fields.
- Expected annual production – 390 tonnes of finished compost – (which means the facility was expected to take in approximately 1000 tonnes of un-composted material from their own chicken farm and other outside sources combined).

Also, at this time an Environmental Impact Assessment was created by Summit Environmental - (**"Article B"**). We have highlighted the areas of concern in this document in a separate page below for your convenience.

Residents were assured there would be no odour and that no expansion of the facility would take place without proper CSRD rezoning procedure – which would include an environmental assessment AND a public hearing. A Petition (**"Article C"**) against the opening of the facility was distributed and over 100 local community members signed. Despite the strong opposition, Spa Hills Farms proceeded. The initial Key Factors proposal & Environmental Impact Assessment recommendations versus the way Spa Hills Farm operates today is vastly different.

In 2014, the CSRD board amended bylaws and passed regulations to change the allowable use of the zoning – specific ONLY to Spa Hills Farms (**"Article D"**). The board probably thought they were doing what was best at the time. No one would argue that composting is a wonderful thing if done correctly, but this allowed a larger-scale commercial composting facility to operate on 'R' zoned land. It is unknown to us what initiated the change, but it bypassed proper procedure given the potential impact to the community and the local opposition to the Facility. It also did not include an environmental assessment OR a public hearing.

In 2016 Spa Hills Farms expanded to handle 12,000 tonnes of material to be brought in - 3x more organic material per year than their existing facility had been designed to handle – this was done with very little infrastructure change. A change in composting process was reported which allowed the use of windrow composting as a secondary stage of composting – this method generates more odour than the original aerated tower bin method and is a more open process. This went against the strategy used in the original 2009 Summit Environmental Impact Assessment.

This business has been allowed to operate without accountability and oversight. Residents have witnessed burning plastic; residual garbage not being managed and being blown into their properties and the outside compost piles spontaneously bursting into flames.

As per the 2016 Operation Plan (**"Article E"**) prepared by John Paul, PhD Professional Agrologist, a report prepared for compliance with the Organic Matter Recycling Regulation administered by the BC Ministry of the Environment, **any complaints of odour are supposed to be immediately addressed and rectified to avoid further complaints.** Many neighbors no longer feel they can contact the facility to address these complaints about odour because their concerns are either ignored or met with aggression.

One community member, (Pat Peebles) took the initiative to phone Josh Mitchell, who is the current operator of Spa Hills Farm Composting facility. She has had experience with mediation work in past years and as the community has been gathering to discuss horrific situation, she was brought in to help. In conversation with Josh Mitchell, she shared the fact that she represented many neighbors with very deep concerns regarding the compost business. At that point, Josh was defensive, loud-voiced and attempted to justify all of the negative effects of Spa Hills Farm. Some of his defensive comments were, "Prove it! You can't prove that the meat came from my place! If you can't prove it, you can't touch me!" and, "Prove the smell is coming from here, you can't prove it!" As she listened to his irrational verbal assault it became clear why the neighbouring residents are reluctant to reach out or approach him. Clearly, if he cared about the problems existing around his business, he would invite his neighbors in to discuss any issues. This is obviously not his intent.

#2 IMPACT ON THE COMMUNITY

The direction that Spa Hills Farm has taken is not environmentally sustainable for this area, because of the risks to land, livestock & the community.

There's nothing green about what's happening at Spa Hills Farm. They may have started with good intentions, but it's become a world of toxicity and greed.

- a) **WATER & SOIL CONTAMINATION:** Our community banded together and had the water in the aquifer that runs beside Spa Hills Farm tested. The testing facility (CARO) could not believe how high the E. Coli and Coliforms and other toxic elements were, the levels were higher than what CARO's machines would be calibrated to measure. We also had the water tested where this aquifer runs into Salmon River, and the E. Coli and toxic elements were also extremely high. In January of this year the Provincial Ministry of Environment and Climate Change Strategy sent an inspector as per our request to Spa Hills Farm. The report (**"Article F"**) indicates many areas were found to be in NON-compliance. At this time there are other local entities that are currently planning to do further testing of the water ways and local wells in that area, and we are confident that they will prove out these findings also.
- b) **POTENTIAL DISEASE:** The potential for a serious disaster! As you can see from the attached photos and the video, birds are constantly flying into their composting area, grabbing body parts of dead animal meat and decamping slaughter byproducts. We were told that there was NEVER to be any bovine (cattle) prions (heads and spines) in their compost. Spa Hills Farm has their compost bins in just about every meat butchering facility throughout the entire Okanagan Valley and Kamloops and beyond. There are prions of chickens, sheep, pigs, wild game, etc. in many of

these facilities. (We have included some articles of interest within our package that pertain to this issue.) Euthanized horses are often brought to Spa Hills. These are ground up and added into the compost mix. After consulting with local veterinarians, we have learned that the drugs used in euthanizations require that animals injected with it are to be buried 8 feet in the ground, for a minimum of 5 years of undisturbed ground, OR, they are to be put into a crematorium and burned. NO chemically euthanized animal is EVER to be openly composted. The drugs used will remain in the compost as a deadly toxin, yet farmers spread this compost on their fields, which has the potential to poison crops and livestock due to the mishandling of these euthanized animals.

- c) **FIRE RISK:** There's a serious fire risk associated with Spa Hills Farm. Neighbors have reported that many of the outdoor piles are often seen spontaneously igniting with large flames. These types of fires (combustion fires) cannot simply be doused with water, they need heavy machinery to break apart the piles before they can even begin to calm the flames. As seen in photos, there is NO open ground surrounding the piles to safely pull them apart to put out a fire. It's ineffective to call the fire department when these piles MUST be spread apart before water even touches them, as water can make the fire worse! Climate change has clearly given us longer periods of extreme heat and high winds. This is a heavily forested area. If the wind took these flames to the tree line that is within feet of the burning compost piles, Silver Creek and the Salmon Arm Valley would be at risk of burning to the ground!
- d) **ODOUR:** One of the biggest problems, and one that we were promised at the onset of the operation, was that there would be no odour from Spa Hills Farm Composting facility. There is no doubt that had they followed all the recommendations of the initial Summit Environmental Impact Assessment report, and continuously monitored and maintained the facility that the odour would have been minimal. However, this has obviously not been the case! As we now know, they are bringing in way more material than their facility can manage and not following any of the original design guidelines which in turn has created an odour problem, this makes it unlivable for a large number of neighbours in all directions. This is not just a nuisance odour! We are now uncovering research that the material which is causing the intense odours can pose a serious health risk to humans and other wildlife and animals.

Can this CSRD board live knowing the risk is so high, and are they willing to deal with the legal ramifications that would come from a catastrophic disaster such as this? We are trying to warn you now. We've done the research, we've got the photos, we're telling you there's a huge risk here.

#3 PROPOSED SOLUTIONS

The community is not asking to close this facility down, the residents understand that composting and dealing with waste is a concern we all share.

- We are asking the board to put this facility back to the 2009 Environmental Impact Assessment report produced by Summit Environmental Consultants LTD. This solution would allow the facility to continue to operate, if they were following the correct procedures in an enclosed structure. This would include shrinking the volume and regulating the material that the facility brings in.

- Trained compost inspectors are needed, licencing measures should be required, and accountability procedures put in place to ensure this facility is operating in a safe manner for the people and the land around them.
- We recommend that the CSRD hire a trained compost professional as a consultant, who reports ONLY to the board. We feel that they would have the training and knowledge to create composting facility designs that create minimal odour and contamination to the environment. We strongly feel that they would have the training and expertise to create a program of oversight and accountability and we also believe that it's important that the trained person would answer and report directly to the local government and should not be the hire of the composting facility.

#4 MOVING FORWARD

In Summary, we are currently seeking legal advice and are preparing to pursue this issue with the local and the Provincial Government for the lack of oversight (ie: permits and inspectors for composting facilities). We are also seeking legal advice pertaining to the CSRD for allowing this to happen (ie: manipulating zoning and not creating oversight for so many years, leading to the current disaster for Area D we face today).

While we have many Victim Impact Statements (as per legal advice) we have included 5 in this package (**"Article G"**) as a sample to give you an idea of the trauma and concerns that the residents are living with.

We understand this board is a proponent towards green initiatives, and we are really hoping that you will take our concerns seriously and see the potential for various catastrophic events. We do recognize that composting is a necessary entity and believe with the guidance of professionally trained expert, (such as John Paul who was the main contributor/ designer of the original Summit Environmental study) this local government could be an example to the rest of the province of how to create competent, well run composting facilities.

The Splatins First Nations and the Okanagan Indian Band share our deep concerns about the environment, especially the water quality of Salmon River, and are in full support of our initiative. We look forward to working with the CSRD and have great hopes of coming up with a solution.

Thank you for your time,

The Concerned Residents in the Silver Creek Community

NOTE: CSRD Privacy Officer has removed Article G to prevent unauthorized disclosure of personal information under the Freedom of Information and Protection of Privacy Act.

Environmental Impact Assessment

created by Summit Environmental -
(Article B").

Suggested reading with specific areas of concern:

Page 3 1.2.1 Project Overview and EIA scope

Page 8 1.3.3 Process Description

Page 10 Storage and transportation of waste

Page 13 End use of compost

Page 15 1.3.7 Regulatory requirements, legislation and permits.

Page 16-17 Leachate control system for the facility and odour control in the proposed facility

Pages 22-23 Issues Identified and Social-Economic Community Issues

Page 39 Human Environment

Page 42-43 4.1.1 Groundwater quality and quantity

Page 45-49 4.1.3 Odour and air quality

Page 57-59 4.2 summary of mitigation measures

Page 66-68