



INTERIM ENGAGEMENT SUMMARY REPORT

Food Sector Grease Interceptor Bylaw Review

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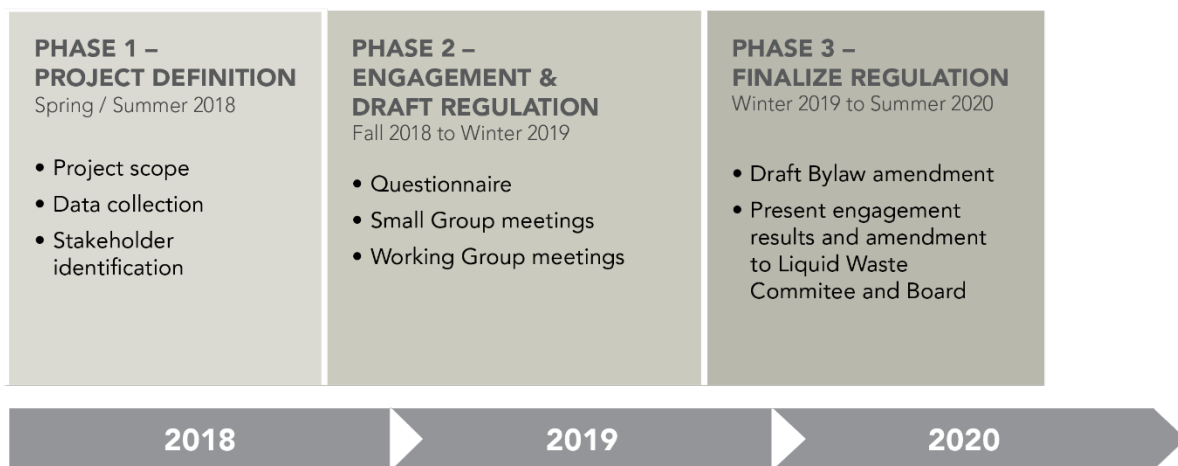
1.0 Introduction

1.1 Report Purpose

This document provides a description of the engagement and communication activities and key findings of the engagement program for the Food Sector Grease Interceptor Bylaw (No. 268, 2012) Review. This interim report covers Phase 1 and Phase 2 activities completed in 2018 and 2019. Engagement objectives and key audiences are covered in section 2.0. Engagement activities are described in section 3.0. A thematic summary of stakeholder concerns, comments and questions is presented in section 4.0. Detailed meeting notes are available on Metro Vancouver's website. A final report will be completed at the conclusion of the Working Group meetings in early 2020.

The Bylaw Review spans three phases: Project Definition; Engagement and Draft Regulation; and, Finalize Regulation. This interim summary report covers Phases 1 and 2, except for the Working Group meetings.

GREASE INTERCEPTOR BYLAW REVIEW TIMELINE



1.2 Overview

The GVS&DD Food Sector Grease Interceptor Bylaw No. 268, 2012 sets limits on the amount of fats, oils, and grease that can be discharged by a food sector establishment. To meet these limits, food sector establishments must have all grease-bearing fixtures connected to an appropriately sized and maintained grease interceptor.

High levels of fats, oils and grease in the sewer system result in costly maintenance issues and pose potential risks to human health and the environment. Accumulated fats, oils and grease can cause sewers to overflow, potentially damaging homes, businesses and the environment. Food sector establishments are a major source of fats, oils and grease in the region. The most sustainable methods of managing fats, oils and grease are to:

- minimize grease from entering the system; and
- segregate and manage the remaining fats, oils and grease at the source, which is achieved through the use of a properly sized and properly maintained grease interceptor.

There are ongoing non-compliance issues, as evidenced by enforcement reporting and documented fats, oil and grease “hot spots” across the region. Metro Vancouver is reviewing and updating its Grease Interceptor Bylaw in support of the region’s Source Control Program.

The bylaw review process seeks stakeholder input on:

- Bylaw language to ensure clarity and understanding of requirements
- What fixtures should be connected and what shouldn’t be connected to a grease interceptor
- Methodology for determining rated flow capacity for each fixture
- Determination of the minimum size for grease interceptors
- Regulatory options to address commercial food grinders and digesters and the impacts of these options
- Opportunities to enhance educational tools
- Timing of proposed bylaw changes
- Impacts of changes to fee structure

2.0 Engagement Program

A targeted, in-person approach to engagement was adopted to ensure the needs, interests and inputs of all potentially impacted groups are considered. Engagement program tactics include: sector notifications, advertising, online questionnaire, small group meetings and a working group.

All input received will be reported to stakeholders, the Liquid Waste Committee and GVS&DD Board at the end of the process, along with staff recommendations for proposed bylaw amendments.

2.1 Objectives

Specific objectives of the engagement are:

- To understand factors preventing full compliance with the bylaw (awareness, comprehension, equipment, systems, enforcement)
- To inform potential changes to the bylaw and the development of education materials that will result in increased compliance (and reduced fats, oils and grease entering the sewer system)

2.2 Stakeholder Groups

The following stakeholder groups were initially identified for engagement during the bylaw review:

- Small-medium food service establishments (restaurants, cafes, pubs, coffee shops, bakeries)
- Chain food service establishments (restaurants, cafes, pubs, coffee shops, bakeries)
- Non-English-speaking food establishments (Mandarin and Punjabi)
- Supermarkets and grocery stores
- Institutional kitchens/cafeterias (hospitals, schools, post-secondary institutions, care homes)

- Food trucks and other mobile food retailers
- Commissary kitchens (serving food trucks and other mobile food retailers)
- Fermentation operations (with commercial kitchens)
- Caterers / party rentals
- Delis, butchers and fishmongers
- Culinary schools
- Industry, business and professional associations (restaurant, food truck, caterer, craft brewery, chefs, grocers, hotels)
- Manufacturers, consultants (grease interceptors, food grinders, digesters)
- Interceptor maintenance providers and haulers
- Plumbers and plumbing contractors
- Design engineers
- Private anaerobic digesters and Fortis BC
- Municipalities
- Building / plumbing inspectors
- Health authorities

2.3 Tools & Tactics

Notifications – Notice of bylaw review and engagement opportunities distributed by letter mail, email, Metro Vancouver website and association publications and websites.

Small Group Meetings – Two-hour in-person meeting with up to 16 participants, led by a trained moderator accompanied by a note taker. Includes presentations from Metro Vancouver policy, engagement, and enforcement staff.

Questionnaire – Online questionnaire on Metro Vancouver website.

Working Group – The group will be a representative mix of impacted and interested stakeholders. A forum for ongoing dialogue as the project advances through engagement to proposed bylaw changes. Meetings will be led by a trained moderator accompanied by a note taker. Separate dedicated meetings will also be held.

Stakeholder database – Comprehensive list of sector representatives compiled from Hoovers Business Directory Services (D&B Hoovers), existing Metro Vancouver databases and independent research. Dynamic tracking of inquiries and responses throughout the engagement period.

3.0 Engagement Activities

3.1 Notification and Recruitment

Project notification letters and emails, including an invitation to participate in a Small Group Meeting, were issued to 10,496 impacted and interested stakeholders in the region. In addition, the BC Asian Restaurant and Café Owners Association, BC Restaurant & Food Service Association, the BC chapter of the Baking Association of Canada, the Vancouver Street Food Society, Western Convenience Store

Association, BC Craft Brewers Guild, Hotel Association of Vancouver and Restaurants Canada distributed details about the engagement process to their members.

To meet desired participation by sector group, a secondary recruitment drive was completed by phone, with priority assigned to FSEs with premises located in proximity to grease hot spots. In addition, 16 stakeholders with particular technical expertise were invited to attend a specific Small Group Meeting, e.g. haulers, manufacturers.

Recruitment for the Mandarin speaking meeting was done through BC Asian Restaurant and Café Owners Association. Recruitment for a Punjabi speaking meeting was pursued through the South Asian Business Association (SABA) and the Surrey Board of Trade. In addition, an advertisement in Punjabi was placed in the Indo-Canadian Voice and in-person visits were completed at 16 Food Sector establishments located on Scott Road/120th St., between 84 and 92 Ave., in Surrey and Delta.

60 participants attended a Small Group Meeting. Written submissions were received from two individuals who were unable to attend in person.

3.2 Small Group Meetings

Ten Small Group Meetings were hosted to facilitate discussion relating to bylaw compliance and identify special considerations of stakeholder groups with unique interests or characteristics.

Metro Vancouver staff delivered a presentation, customized to each stakeholder group, that covered the following topics:

- The engagement process
- Technical details
- Current status of the bylaw and enforcement.

Through the facilitated discussion input was received on:

- What fixtures must, and must not, be connected to a grease interceptor
- The sizing methodology for a grease interceptor
- New regulatory options to address commercial food grinders, "digesters" and similar technologies
- Fees
- Educational tools

All comments were non-ascribed, except where comments related to a particular technology or service. Detailed notes were completed for each meeting and are available on the Metro Vancouver website. A summary of the key themes across all 10 meetings is included in section 4.0.

The meeting dates, stakeholder groups and attendance numbers are shown in the table on the next page.

Grease Interceptor Bylaw Review Small Group Meetings

Meeting Date	Stakeholder Group	# of participants
24 Sept 2018	Food Service Establishments – small/medium plus business associations	6
25 Sept 2018	Food Service Establishments – chains plus business associations	12
2 Oct 2018	Non-English Speaking - Mandarin	10
3 Oct 2018	Haulers and Maintenance Providers	5
12 Oct 2018	Plumbers, interceptor maintenance providers, manufacturers	11
19 Oct 2018	Food waste to energy manufacturers, Fortis	3
23 Oct 2018	Institutional kitchens, supermarkets, large grocery stores and culinary school	4
9 Nov 2018	Food trucks (Association President)	1
8 Jan 2019	Digesters & Grinders	5
6 Mar 2019	Building Officials Association of British Columbia Executive (BOABC)	3

(Note: Recruitment efforts for a Punjabi-speaking meeting were unsuccessful. However, members of the Punjabi community were in attendance at a number of the English-speaking meetings.)

3.3 Municipal Engagement

Municipalities receive information and have the opportunity for input at meetings of the Local Government Fats, Oils and Grease Working Group and at the Regional Engineer Advisory Committee – Liquid Waste subcommittee. Municipalities provided feedback at Municipal Fats, Oils and Grease Meetings led by Metro Vancouver staff in 2019. City of Vancouver enforcement staff attended most of the Small Group Meetings.

In addition to the March 2019 meeting with Building Officials Association of BC (BOABC) executive, Metro Vancouver staff also delivered a presentation to a regular meeting of the BOABC Lower Mainland Zone, hosted at the City of Richmond offices on September 14, 2018.

3.4 Questionnaire

An online questionnaire was developed and is accessible through a link on the Metro Vancouver website. The questionnaire will remain open until the end of Phase 2 of engagement. The link to the questionnaire was included in all notification materials and individual meeting invitations and correspondence. Emails

were also sent to interested parties and food sector establishment associations were asked to distribute the link to the questionnaire.

As of 14 May 2019, 16 questionnaires were submitted through the online portal. Key themes of the submissions are outlined below in section 4.2.

4.0 Engagement Themes

4.1 Small Group Meeting Key Themes

The following themes emerged during the Small Group Meetings and engagement with municipalities at Municipal Fats, Oils and Grease Meetings. The themes also reflect comments, questions and issues provided in written submissions. Note the themes represent the opinions and experiences stakeholders shared during the engagement process and don't necessarily reflect Metro Vancouver's views.

Retroactivity

- Misunderstanding that there is grandfathering in effect.
- Request to consider retroactivity/grandfathering for establishments without grease interceptors or insufficiently sized grease interceptors who were doing business prior to the introduction of the 2012 bylaw requirements.

Installation and Upgrade Costs

- Cost of renovations and lost revenue due to business closure to install or upsize grease interceptor to meet bylaw requirements.
- Concern that restaurants cannot bear the high cost of renovations.

Residential vs. Commercial Sources of Fats, Oil and Grease

- Residential dwellings should be addressed as they are also a significant source of fats, oil and grease in the wastewater system.

Sizing

- Confusion and challenges with sizing methodology.
- Suggestion that bylaw should ensure current Canadian Standards Association (CSA) standards for design and installation are referenced in the bylaw (sizing and fixtures).
- Concern about increase in large grease interceptors being installed in the region, particularly as CSA only certifies grease interceptors up to 100 gallons per minute.

Fixtures

- Questions on the rationale for attaching dishwashers to a grease interceptor.
 - Questions regarding glass washers and sanitizers and if they should be attached (hot water temperatures and soap products) to a grease interceptor.
 - Concern about space requirements for grease interceptor.
 - Questions about floor drains.
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Inconsistency Between Jurisdictions

- Process inconsistency between municipalities and Metro Vancouver with interpretation of requirements and implementation.
 - Lack of coordination between building and plumbing codes with bylaw has resulted in work delays.
 - Suggestion to establish a central resource that could be accessed by establishments to coordinate the various jurisdictional requirements.
 - Confusion regarding building code vs. bylaw requirements and which one has precedence.
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Installation and Access

- Some establishments are constrained by the amount of space available to install grease interceptors on their property.
 - Engineers identified challenges in developing plans that incorporate existing grease interceptor sizing requirements.
 - Haulers and plumbers have encountered access challenges, based on the installed location of the grease interceptor.
 - Property developers not adequately addressing the need for grease interceptors in their building designs (e.g. placement of grease interceptors and allocating space for future installation).
 - Introduction of more mixed commercial units in the region, where office or residences occupy the upper floors with commercial businesses occupying space below.
 - Some developers are not designing/constructing new buildings to accommodate grease interceptors that may need to be installed by food sector tenants.
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Fees and Fines

- Risk for non-compliance of bylaw is low for food sector establishments.
 - Amount of fee is low vs. cost of renovation - not a deterrent.
 - Low chance of inspection.
 - Discussion of polluter-pays system.
 - Importance of fines as an enforcement tool.
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Monitoring & Enforcement Resources

- The bylaw is a key tool for keeping fats, oils and grease out of the sewer.
- The bylaw is required to ensure food sector establishments install and maintain a grease interceptor.
- Plumbers and hauling/maintenance companies supporting monitoring and compliance.
- Provide guidelines for, or certification of, hauler/maintenance companies.
- Develop a reporting template for haulers to provide to food services establishments when grease interceptor is serviced.
- Develop an approved/preferred contractors list with qualified grease interceptor contractors. As part of the program, approved haulers and plumbers would electronically submit confirmation that the grease interceptor is being maintained and in compliance (referred to as Approved Haulers Program or Preferred Hauler Program).
- Questions about why Metro Vancouver doesn't licence haulers.
- Concerns that there are no follow-up inspections to ensure grease interceptors are being maintained.

Incentives

- Financial or economic incentives as a means of offsetting the investment required by food sector establishments to achieve compliance.

Business Licencing

- Make approval of municipal business licences conditional on compliance with the grease interceptor bylaw.
- Information on compliance could be included with business licence renewals.

Awareness, Education & Research

- Support from plumbers and haulers to help with distribution of education materials.
- Provide written information for municipalities to share with permit applicants well in advance of changes.
- Importance of using clear terminology (e.g. the word "grease" can be misleading).
- Include list of fixtures that need to be connected to a grease interceptor in the Summary of Requirements document that is available on the Metro Vancouver website.

Commercial Digesters (feedback from FSEs, haulers and municipalities)

- Very few examples in use.
 - Very little knowledge about what they are and what they do.
 - Maintenance high, units expensive.
 - Some larger establishments (hotel chains) have been approached regarding this technology.
 - No concerns with regulation or prohibition of food digesters.
 - Food digesters are not listed in the BC Plumbing Code as an approved fixture.
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Commercial Food Grinders (feedback from FSEs and haulers)

- Very few examples in use at commercial scale.
 - High maintenance costs, expensive.
 - No concerns with regulation or prohibition of food grinders.
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Commercial Food Grinders and Digesters (feedback from manufacturers)

- Acknowledgement that their products increase the organic loading (Biochemical Oxygen Demand and Total Suspended Solids) from food service establishments that utilize them. [Metro Vancouver is concerned with both organic loading and fats, oils and grease from food service establishments]
- Encourage Metro Vancouver to look at loading limits as opposed to concentrations limits where relevant.
- Assertion that use of these technologies provides a net energy gain by sending food waste to treatment plants that have digesters.
- Assertion that these technologies take advantage of municipal infrastructure to keep trucks off the road, thereby reducing carbon emissions. The International Plumbing Code (2018) specifies that a food waste disposer (grinder) should not discharge to a grease interceptor. Grinder manufacturer assertion that this conflicts with the current Metro Vancouver bylaw, which requires that food grinders must be connected to a solids interceptor that is connected to a grease interceptor if the wastewater discharged contains or may be contaminated with fats, oils and grease.

4.2 Online Questionnaire Feedback Themes**Awareness**

- Majority indicated being aware of the bylaw prior to completing the questionnaire.

Bylaw Information

- Many responses indicated the Grease Interceptor is not a priority in their regular operations nor have they visited the Metro Vancouver website for any information.
- The main source of information for the FSE operators is from those individuals who work directly on their grease interceptor (hauler, maintenance provider, plumber).

FSE Grease Interceptor Management

- The majority of businesses have basic knowledge of the requirements of the bylaw, but it is not an active part of their business protocols until it needs to be serviced.
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5.0 NEXT STEPS

5.1 Working Group

Metro Vancouver staff are developing proposed bylaw recommendations with the primary purpose to keep fats, oils and grease out of the sewer system. These recommendations will be informed by the feedback received during the first phase of engagement. A Working Group will be formed to review and provide comment on the proposed bylaw recommendations. The Working Group will include representation from the Small Group Meetings. Dedicated meetings will also be held to address technology and sector-specific issues (e.g. grease interceptor sizing, commercial food grinders and digesters).