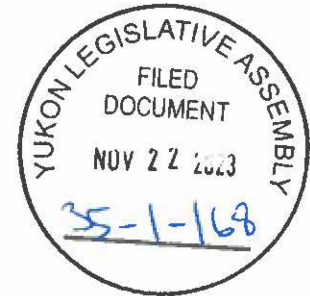




November 10th, 2024

Minister Richard Mostyn  
Minister of Community Services  
P.O. Box 2703, Whitehorse, Yukon Y1A 2C6



To: Minister of Community Services

Re: Environmental Contamination at Yukon Landfills

Dear Minister Mostyn,

The Yukon Conservation Society (YCS) is a grassroots environmental non-profit organization, established in 1968. Through a broad program of conservation education, input into public policy, and participation in project review processes, we strive to ensure that the Yukon's natural resources are managed wisely and that development is informed by environmental considerations.

**The Yukon Conservation Society is concerned about unregulated garbage disposal in community landfills across the Yukon.**

Of particular concern is the disposal of liquid hazardous wastes, such as automotive fluids and paint thinners. Once they enter surface waters or groundwater ecosystems, these fluids can cause extreme damage (it is said one litre of oil can render a million litres of water unfit for human consumption) and be very costly to remediate. YCS understands that the collection and processing of these materials will soon be regulated by the forthcoming Extended Producer Responsibility (EPR) initiative, which means the producers of these products will be responsible for submitting a management plan for them very soon. YCS is curious to see how the Yukon Government will ensure that EPR address the disposal of these items in communities outside of Whitehorse.

Another issue is disposing of copious amounts of commercial and industrial waste at landfills originally intended to handle smaller volumes of household waste. Commercial and industrial waste can contain metals and chemicals that are hazardous to humans, fauna, and flora. These need to be disposed of at proper facilities. It is the understanding of YCS that EPR will address some commercial and industrial waste, but not all. It is important that all Yukon communities have access to the same level of service as the EPR initiatives will provide to the Whitehorse area.

Given the very strong possibility that some industrial and commercial wastes can catch or cause fires if not disposed of properly, it is vital that they be kept out of smaller landfills. The fire risk to the boreal forest is bad enough without having landfills pose an additional risk.



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An approach to dealing with these issues is to ensure all community landfills follow Environment and Climate Change Canada's guide "Solid Waste Management for Northern and Remote Communities." This document is available online at <https://www.canada.ca/en/environment-climate-change/services/managing-reducing-waste/municipal-solid/environment/northern-remote-communities.html>.

Facilities that conform to the guide mentioned above will include gating, wildlife fencing, trained staff, tipping fees, dedicated sorting areas, storage facilities for waste and recycling/reuse, hazardous waste safe storage, and waste reduction efforts such as composting. These initiatives create jobs, promote waste diversion, and extend the life of landfills, which lowers costs in the long term. It also allows all levels of government (First Nation, territorial, and municipal) to work together on waste management issues.

These facilities are not cheap to operate but compared with the cost of environmental cleanups at non-standard facilities, it is easily worth the cost of implementation.

YCS recognizes that some currently existing smaller landfills will have to close. It is not possible to implement the "Solid Waste Management for Northern and Remote Communities" guidelines in an environmentally and fiscally appropriate manner at some of these landfills. However, closures should only be done as long as there is an alternative landfill within a reasonable distance and there is support for waste diversion to the greatest extent possible.

**Changes to waste disposal sites in the Yukon are long overdue if the Yukon is serious about protecting the environment.** It is recognized that change to such an essential service can be discomfoting to those who use these sites. Appropriate public education and transition plans must be part of such an initiative.

If there is anything the Yukon Conservation Society can do to assist in this effort to protect the environment, please do not hesitate to contact us.

Yours truly,

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