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December 21, 2017

File: 0220-20
General Correspondence

David Lawes, Executive Director
BC Used Oil Management Association
107 – 1834C Oak Bay Avenue
Victoria, BC
V8R 0A4

Dear Mr. Lawes:

RE: BC USED OIL MANAGEMENT ASSOCIATION CONSULTATION

The purpose of this letter is to provide input on proposed changes to your stewardship plan.

We are concerned about BC Used Oil Management Association's (BCUOMA) proposed approach to setting minimum service levels for the number of facilities required to collect used oil, oil filters, antifreeze and oil/antifreeze containers. You are proposing to use the concept of a "user intensity matrix" based on community type and population combined with the Stewardship Agencies of BC's (SABC) driving distance benchmarks to determine the level of need.

The proposed minimum service level for the Capital Region is two facilities, in Saanich and in Sooke. You did add an additional facility in Saanich since its population exceeds your level of service proportional to the size of the community (one per 100,000 people). Your report does not list our electoral areas.

The BC Recycling Regulation stipulates that the stewardship plan adequately provide for the producer collecting and paying the costs of collecting and managing products and for reasonable and free consumer access to collection facilities. Given the nature of the products managed by BCUOMA, the proposed minimum service levels appear inadequate for our region.

We are also concerned that 'populations living in Electoral Areas that do not have a facility or are not within 45 minute drive to a facility' are considered exceptions to your program. This seems to be based on benchmarks provided by SABC. In the January 2014 submission to SABC's Action Plan Consultation, CRD staff requested that accessibility standards should apply to all communities in British Columbia, including our electoral areas. We maintain this position.

SABC's accessibility standards of 45 minute drive to a collection facility in rural areas and 30 minutes in urban communities are guidelines only. The BC Recycling Regulation lists a number of factors for determining service standards and levels, including the nature of the products, convenient options for the collection of products in urban centres and small, isolated communities, and the elimination or reduction of the environmental impacts of products. The minimum service levels proposed by BCUOMA may have unintended consequences as they limit the ability of residents to recycle these materials. This may result in consumers abandoning the materials,

throwing them in the garbage or dumping them down storm drains. Materials such as oil and antifreeze require higher standards and levels of service than other recyclables.

In 2017, recycling options for used oil and antifreeze products were noticeably reduced in the Capital Region as some retailers ended their return programs, likely in response to market changes. Our information line received a number of calls about what to do with these types of materials, indicating a lack of consumer awareness about the changes. At the same time, quantities received at the Hartland recycling facility have increased significantly which appears to be the result of reduced accessibility to other more convenient drop-off locations. We recommend that BCUOMA increase its awareness programs to educate consumers about return options and best practices for handling the materials.

Thank you for considering our feedback.

Yours truly,



Tom Watkins,
Manager, Policy & Planning,
Environmental Resource Management
Parks & Environmental Services

TW:ac

cc: Valentina Yetskalo, File Lead, Ministry of Environment