



December 20, 2017

File: 5360-40-06

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

Dear Mr. Lawes:

Re: BC Used Oil Management Association Consultation – City of Abbotsford Submission

Thank you for inviting the City of Abbotsford (City) to participate in the current British Columbia Used Oil Management Association (BCUOMA) consultation. We appreciate the opportunity to provide comments on the current challenges with the collection and management of used oil, filters, antifreeze and oil/antifreeze containers in Abbotsford. The City has prepared this letter in order to reiterate its previously submitted concerns with the status of the BCUOMA program in Abbotsford, and to comment on the proposed Stewardship Plan targets.

The City has seen a significant decrease in the number of local collection facilities under the BCUOMA program in recent months, and currently has only one location for resident drop-off. The City is concerned that this service level is not adequate given its geographic size and population, and does not meet the BCUOMA mandate to ensure the responsible collection and management of program material as required under the Recycling Regulation. For the same reasons, the minimum service levels proposed for the BCUOMA Stewardship Plan would not provide a sufficient number of drop-off locations in Abbotsford. With an unsuitable number of collection sites, there is a strong possibility this material will end up in other waste streams, in municipal infrastructure or in the natural environment.

Based on our recent correspondence on this matter, the City understands that the BCUOMA is working to find alternative options for the collection of program material in Abbotsford. The situation is a high priority for Abbotsford, and additional measures are required as soon as possible to remove the current barriers to adequate collection of used oil in the City.

Thank you again for the opportunity to provide comments as part of the BCUOMA consultation. Your consideration of the City's comments is appreciated, and we look forward to continuing to support the BCUOMA as it finds workable solutions to ensuring the responsible collection and management of program materials. If you have further questions, please contact Nathan Koning, Acting Director, Project Management Office, at 604-557-1465 or nkoning@abbotsford.ca

Yours truly,

Peter Sparanese, P.Eng.
General Manager, Engineering and Regional Utilities

- c. Honourable George Heyman, Minister of Environment and Climate Change Strategy
Mayor Henry Braun, City of Abbotsford
City of Abbotsford Council Members
George Murray, City Manager, City of Abbotsford

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