

December 19, 2017

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

Via Email: DLawes@usedoilrecycling.ca

RE: Stewardship Plan Consultation for BCUOMA

Dear Mr Lawes,

Thank you for the opportunity to participate in the BC Used Oil Management Association (BCUOMA) stewardship plan consultation. The Fraser Valley Regional District (FVRD) is a regional district that has all types of communities as listed in table 1 of the MNP report titled "Development of a User Intensity Matrix for the Return Collection Facility Incentive Program. It is home to nearly 300,000 residents and the following comments are submitted in relation to service gaps that are currently being felt by residents in the region and the direction of the BCUOMA stewardship plan. FVRD member Municipalities may also be submitting their own comments.

- The FVRD has seen an overall reduction in service in our region most notably within our largest Municipalities. This has been exacerbated by collectors such as Canadian Tire dropping out of the stewardship program. It is disappointing that this shift has reduced accessibility, given the number of depots that no longer collect residential used oil. There is an understanding for higher standards, but this should not come at the expense of improving accessibility. What does BCUOMA believe can be done in partnerships with the Province and Municipal governments, to cut down on the amount of illegal dumped of materials at collector's premises.
- There is also concern with a shift to the MSP minimum service levels. This is because other factors should also determine a service level. For example, the Abbotsford Sumas major aquifer which is the sole source of drinking water to the City of Whatcom in the State of Washington, USA. It also serves as a secondary source of drinking water to the City of Abbotsford. Current service levels in Abbotsford do not provide enough points of collection for the residents and reliance on 1 or 2 collectors does not provide adequate business continuity in the event of unforeseen risks. The risk to the environment from dumping of used oil or antifreeze is a major concern within our region. Protection of the international aquifer must be used as a factor to fund further accessibility.
- The future of used oil recovery locations appears to be centred on transfer stations and landfills. While the FVRD believes there is a role for Municipalities and the Regional Districts to help provide education for the collection of used oil or anti-freeze, greater efforts should be made consolidate those collectors who already provide a service. There should not be a continued transfer of collection points away from those who sell or already deal with used oil. The program should be 100% funded by stewards. The fact that the operational funding available to program operators is 2X's more for anti-freeze and 3X's more for oil than funding that was available in the past should be

enough of an incentive to find and win over collectors. The FVRD is aware that the District of Mission has received funding to provide a collection point at one of their recycling depots. The FVRD does not want to take away from the opportunities to provide collection points but it should be in addition to funding collection points with those who sell both oil and antifreeze.

- There are adequate collection facilities in Agassiz and Hope. Could you please provide some assurance from BCUOMA that changes to the stewardship plan will not affect the current collectors in the eastern part of our region.

Please do not hesitate to contact me to further discuss any of the above matters.

Sincerely,

Jamie Benton
Environmental Services Coordinator
604 703 5021

cc: Teresa Conner, Senior Policy Advisor, Environmental Services Branch, Ministry of Environment & Climate Change Strategy
Mark Zacharias, Deputy Ministry, Ministry of Environment & Climate Change Strategy