

## Sunshine Coast Regional District

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December 20, 2017

Mr. David Lawes  
BC Used Oil Management Association  
#107 – 1834C Oak Bay Avenue  
Victoria, BC V8R 0A4

Submitted via email

Dear Mr. Lawes,

### **Re: BC Used Oil Management Association Stewardship Plan Consultation - Target Updating**

Please accept this letter as feedback for the BC Used Oil Management Association (BCUOMA) Stewardship Plan Consultation regarding target updating. The SCRD has the following comments related to the updated targets:

- **Minimum Service Levels for Consumer Recycling**
  - Solid waste staff have concerns with BCUOMA's proposed minimum service levels for consumer recycling. These proposed service levels are adapted from the minimum service levels outlined in the Stewardship Agencies of BC 2013 Action Plan. As used oil and antifreeze are hazardous materials, service levels should be tailored to the material type and pollution risk. SCRD solid waste staff encourage BCUOMA to set a higher standard of service levels for consumer recycling oil and antifreeze for BC and the Sunshine Coast by ensuring there is access to recycling for these products in every municipality or community hub.
  - According to BCUOMA's proposed service levels outlined in the November 2016 MNP study, the Town of Gibsons (population 4,605 – 2016 Census) will not require a return collection facility (RCF) and residents will need to drive 30 minutes to the closest RCF in Sechelt to return used oil and antifreeze. In reality, the SCRD's 'south coast' comprises of the Town of Gibsons, Electoral Area F (West Howe Sound), Electoral Area E (Elphinstone) and Electoral Area D (Roberts Creek), with a total population of 13,733 (2016 Census). Solid waste staff suggest that the south coast requires a minimum of one RCF for consumers. The majority of the south coast population uses the Town of Gibsons as the commercial hub and some households in Electoral Area F (West Howe Sound) are a 40+ minute drive to the Sechelt RCF.
  - Other provincial stewardship programs such as batteries and health products have multiple drop-off locations in the three SCRD community hubs: Pender Harbour, Sechelt and Gibsons. BCUOMA should strive to have similar service levels by providing adequate incentives and support to all retailers that sell oil products. This would increase residential access to recycling used oil and antifreeze and provide stability to the program.

**ELECTORAL AREAS:** A - Egmont, Pender Harbour B - Halfmoon Bay D - Roberts Creek E - Elphinstone F - West Howe Sound

**MUNICIPALITIES:** District of Sechelt / Sechelt Indian Government District / Town of Gibsons

In addition, SCR D staff have the following feedback about the BCUOMA stewardship program:

- **Role of Local Government**
  - It appears to SCR D staff that BCUOMA wants local government to play an active role in collecting used oil and antifreeze at landfills and transfer stations via the infrastructure grant. Local governments also currently play an active role in communicating the program to residents and taking inquiries and feedback from our residents about service level needs and RCF locations. BCUOMA’s new community collection events also appear to rely on local government support for promotion and implementation support.
  - This approach does not adhere to the BC Recycling Regulation. The steward and private industry should take the lead to fully fund and communicate the program, as per the Regulation.

If there are any questions regarding the feedback, please contact me at robyn.cooper@scrd.ca or at 604.885.6819.

Yours truly,

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**SUNSHINE COAST REGIONAL DISTRICT**



Robyn Cooper  
Manager, Solid Waste Services

cc: Valentina Yetskalo, Policy Analyst, Environmental Standards Branch, BC Ministry of Environment and Climate Change Strategy

Teresa Conner, Senior Policy Analyst, Environmental Standards Branch, BC Ministry of Environment and Climate Change Strategy

Alda Nicmans, Administrator, BC Product Stewardship Council