

341, 110 – 174 Wilson St.

November 4th, 2016

Victoria, BC V9A 7N7

Toll Free: 1-866-254-0555

Fax: 780-414-1519

bcusedoil.com

Dear Stakeholder,

Re: Feedback Requested on Proposed Changes to the BCUOMA Return Collection Facility Program

The British Columbia Used Oil Management Association (BCUOMA) is a not-for-profit industry association responsible for the collection and management of lubricating oil, oil filters, oil containers, antifreeze and antifreeze containers in BC. Of the approximately 50 million liters of oil and 3 million liters of antifreeze that BCUOMA manages each year, an estimated 3% is collected from consumers that service their own vehicles. BCUOMA's Return Collection Facility (RCF) program was started in 2011 and it offers incentives to approximately 500 registered facilities (retailers, service stations, non-profit recycling centers, local government depots) across the Province to accept consumer returns.

BCUOMA is proposing to make changes to its RCF program to improve the consumer experience, upgrade the collection facilities and ensure that there are sufficient return options province-wide for consumers to access at no charge. Please provide your feedback on the proposed changes **by November 24th, 2016** to myself at dlawes@usedoilrecycling.ca

The proposed changes are outlined below:

1. Increase the Incentive for Consumer Returns

BCUOMA is proposing to increase the incentive for consumer returns to \$0.30/L for oil and antifreeze from \$0.10 for oil and \$0.15 for antifreeze. For facilities that collect only consumer material (e.g. depots) the new rate would apply to all the material collected. For facilities that receive consumer returns and self-generate oil and antifreeze through their business (e.g. service stations, lube shops), the incentive would apply only to the portion of material dropped off by a consumer.

2. Add New Multi-material Depot Return Options

BCUOMA is proposing to increase the number of multi-material depots that participate in the program by offering the \$0.30/L for consumer returns and making system adjustments. Many multi-material depots require that the collection system allow for consumer containers with liquids (e.g. paint, pesticides) to be placed unopened into totes for transport versus opened and emptied into a tank which is then pumped out by a collection company. BCUOMA is proposing to provide registered Collectors and Processors a \$0.25/L Return Incentive (RI) premium to collect and manage totes of unopened containers from multi-material depots. This premium is provided as an additional payment to the current zone-based RI. Multi-material facilities would need to negotiate collection arrangements with a BCUOMA registered collection company prior to the commencing of accepting used oil and antifreeze materials. For list of collector's visit: <http://bcusedoil.com/collectors/>

3. Expand the Community Round-up Program

BCUOMA is proposing to expand the Community Round-up program to more rural and remote communities across BC. BCUOMA will aim to launch an expanded program in 2017 and work with local governments, community groups and potentially other stewardship programs. The communities that BCUOMA is targeting for a community



round-up are typically villages (>2500 people) that don't have a facility and are not within the driving distance criteria in the revised BCUOMA Minimum Service Levels (see below).

4. Expand the Infrastructure Grant Program

BCUOMA is proposing to expand the Infrastructure Grant Program to support the set-up of new facilities and upgrade of existing facilities. The grants can be used for new tanks, shelters, spill containment, signage, etc.. The suggested grant size is \$8k per facility (based on actual incurred costs) and the applications will be assessed based on the need within the community and the ability to meet the BCUOMA service level requirements. BCUOMA is aiming to provide up to 25 grants per year.

5. New Advertising Tool-kit

BCUOMA is developing an advertising tool-kit (templates, print ready material, etc.) to support facilities with community advertising and provide helpful information to consumers on how to use the facility. The kit will be developed in early 2017 and expanded and adjusted over time based on user feedback.

6. New BCUOMA Insurance Fund

BCUOMA is proposing to develop an insurance fund to provide some relief to the facilities and collectors that have concerns regarding contamination or spillage with consumer returns. While there have not been any major incidences, this potential concern has been brought to BCUOMA's attention as a potential barrier to participation in the program (particularly by retailers in high traffic shopping centers). The insurance fund criteria would be developed and available potentially by year end 2017. The fund criteria would be developed such that all three parties (collectors, facilities, BCUOMA) share the financial risk.

New BCUOMA Minimum Service Levels

BCUOMA is proposing to adopt new minimum services levels to ensure that consumers have access to facilities throughout BC. BCUOMA has retained MNP LLP to assess BCUOMA's current RCF program and develop a user intensity matrix that allows BCUOMA to make a science-based determination of the location and minimum number of facilities and community round-ups required in BC to meet the minimum service levels. The MNP User Intensity Matrix Report includes recommended minimum service levels and a community listing table outlining the minimum service in each municipality. The MNP report states that the recommended minimum service levels would mean that 99% of the population of BC living in a municipality community would have access to a facility and the remaining 1% (41,072 people) living in small municipalities would have access to recycle through a round-up event. The two MNP reports are available on the BCUOMA website (bcusedoil.com).

Please provide your feedback on the proposed changes by November 24th, 2016 to myself at dlawes@usedoilrecycling.ca

Sincerely,



David Lawes, Executive Director