



BCUOMA

British Columbia Used Oil
Management Association

2015-2020 Stewardship Plan

November 2014

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1 BCUOMA

The British Columbia Used Oil Management Association (BCUOMA) is a not-for-profit Society formed under the British Columbia Society Act in 2003. BCUOMA's mandate is to ensure the responsible collection and management of the used oil, antifreeze, filters and containers required under the BC Recycling Regulation.

Since its inception, BCUOMA has improved collection and recycling performance in all regions of British Columbia – and across all product categories. This commitment to continuous improvement is a major focus in the 2015 – 2020 stewardship plan.

1.1 Legal requirement

Section (4) of the BC Recycling Regulation states:

A producer must submit a product stewardship plan, at the time specified in the applicable Schedule, if any, and in a manner and format satisfactory to a director, for the products within the product category of the product the producer sells, offers for sale, distributes or uses in a commercial enterprise in British Columbia.

This stewardship plan is submitted in accordance with the above regulation.

1.2 Structure

A multi-sector nine member Board of Directors manages BCUOMA, with representatives from the manufacturing, retail, local government and public. An Executive Director reports to the Board and is responsible for operations management, financial management, communications, staff management and general administrative oversight. In order to streamline operations and minimize costs, BCUOMA shares an office in Edmonton with the Alberta Used Oil Management Association (AUOMA).

Producers, through networks of both company-owned and independently-owned retail and wholesale facilities, bring lubricating oil, automotive antifreeze and filters into the province for sale or distribution. Retail facilities range from self-serve gas bars to mass merchandise marketers, quick lubes, radiator shops, and automotive, farm, marine and commercial equipment dealers. Wholesale lubricating oil facilities comprise both branded bulk plants, and independently owned and brand owner warehouses. Oil is sold in containers as small as less than a litre bottles, and as large as 205 litre drums, 1600 litre “lube cubes”, 30,000 litre tank trucks and 50,000 litre rail cars. Automotive antifreeze is mainly sold in 4 - 5 litre containers with very little, if any, sold in containers larger than the tote size (1000 litres). For oil and automotive antifreeze containers, the Regulation applies only to the containers 30 litres or less in size.

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2 Overview

2.1 History

BCUOMA has operated a province-wide collection and recycling program for used oil, oil filters and used oil containers since August 2003 and for anti-freeze since 2011 for both the do-it-yourself market, as well as the commercial and industrial markets.

The BCUOMA program is funded by its producer members through a Environmental Handling Charge (EHC) on the sale or commercial use of new products. Each BCUOMA member determines if and how it will recover its costs for the BCUOMA charge. BCUOMA produces audited annual financial statements outlining the fee revenue and program expenditures.

2.2 Recycling Regulation

The *Recycling Regulation*, replacing the *Post-Consumer Residual Stewardship Program Regulation*, was brought into law on October 7, 2004. Under authority of the Environmental Management Act the regulation sets out the requirements for Product Stewardship in British Columbia. BCUOMA represents the producers of designated products appointed to carry out their legal obligations in accordance with the approved plan.

3 Program

3.1 Products covered under the plan

Lubricating oil:

- petroleum-derived or synthetic
- crankcase, engine and gear oils
- hydraulic, transmission and heat transfer fluids
- fluids used for lubricating purposes in machinery or equipment

Empty oil containers:

- empty containers with a capacity of 30 litres or less, manufactured and used for any product in the lubricating oil product category

Oil filter products:

- spin-on-style or element-style fluid filters that are used in hydraulic, transmission or internal combustion engine applications
- oil, diesel fuel, storage tank fuel, coolant and household furnace oil filters

(Does not include gasoline, air or household furnace air filters.)

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Antifreeze product category

- automotive antifreeze and includes empty containers for this antifreeze

3.2 Collection System

BCOUMA has designated eleven (11) zones across British Columbia. Used oil, oil filters, oil containers, used anti-freeze and anti-freeze containers are regularly picked up from over 4,000 generators by BCUOMA Registered Collectors (collectors). Collectors are required to ship the collected materials to a BCUOMA Register Processor (processor) for an approved end use. Any approved end use must be environmentally sound and be in compliance with environmental requirements.



BCUOMA registers the collectors and processors before they are eligible to participate in the program. Under the Hazardous Waste Regulation, used oil, automotive antifreeze and oil filters are considered a hazardous waste. As well, the oil and antifreeze containers often contain a certain amount of new oil or antifreeze, and measures are required to ensure that proper equipment and vehicles are used to pick them up. As a result, it is important that any collectors and processors handling used oil and antifreeze materials are doing so in compliance with the required environmental standards.

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BCUOMA requires as a condition of registration, and every two years thereafter, that each collector must engage an independent third party qualified professional to conduct an environmental audit of their operations, and state in a Letter of Regulatory Compliance that the operation is in substantial compliance with all applicable provincial and federal environmental legislation and regulations. In addition, the collector and processor must submit a current Business Licence. If either of these two conditions is not met, BCUOMA will not register the collector.

BCUOMA also has approximately 500 return Collection Facilities across BC that provide service for public drop offs. These facilities are often located in high traffic retail locations but can also be located at industrial sites and local government recycling/landfill sites.

3.3 Processors

BCUOMA provides incentives to processors based on the collection volume and location to ensure that oil, filters, antifreeze and containers throughout BC are collected and managed. Collectors have supply arrangements with processors that manage used oil and used oil products for approved uses. These include re-refining and using it as a fuel for pulp mills, cement kilns, asphalt plants and other uses that meet the intent of the Hazardous Waste Regulation or applicable government standards in other states or provinces, such as for mining explosives or exploration drilling. Antifreeze processors already actively involved in processing used antifreeze to the point where an additive package can be added and the recycled antifreeze can again be sold as automotive antifreeze.

3.4 Financing

The program is based on the user-pay concept, an Environmental Handling Charge (EHC) that ensures a fair distribution of the costs associated with collection and recycling of used oil and antifreeze materials that is tied to the point of sale for the consumer/generator, rather than on the material return. A condition of membership with BCUOMA is for producer members to remit their EHCs quarterly.

BCUOMA pays processors Recycling Incentives (RIs) twice a month, provided the processor has supplied BCUOMA with the required supporting information, and has shipped the processed materials for an approved use. For an approved use to be eligible, the use must be environmentally sound and be substantially in compliance with environmental requirements.

3.5 Public outreach

BCUOMA will continue to ensure that timely and relevant information is available to the public on its website as well to lead the BC Recycles Summer Ambassador Program. This highly successful program is a province-wide communications campaign to encourage responsible recycling.

The Ambassador program has grown in success each year, and now has partnered with the Tires Stewardship BC [TSBC], Product Care, HPSA (Medications Return Program - MRP), Electronic Products Recycling Association [EPRA] and Canadian Battery Association [CBA] to communicate the message "Every One Makes A Difference".

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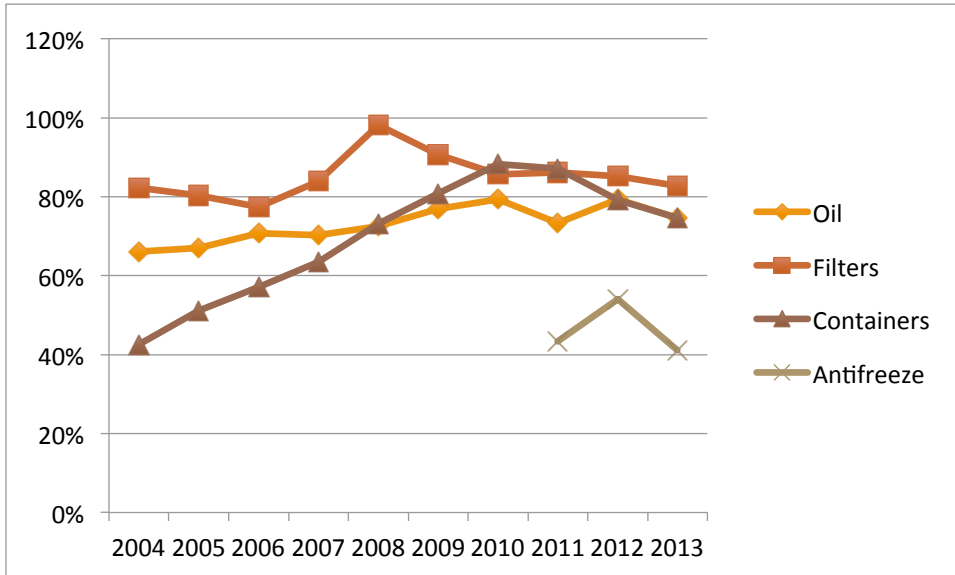
Ambassadors visit municipalities across BC to raise awareness of the hazards of used tires, oil, antifreeze, batteries, medication and household waste as well as the benefits of recycling and reusing them.

BCUOMA will continue to use brochures, municipal recycling calendars, table top displays, other visual displays and relevant public hand-outs as a means of spreading the message to the public on used oil and antifreeze material recycling. BCUOMA also uses traditional and social media to inform the public of the program.

3.6 Effectiveness and recovery rates

Since commencement of operations in July 2003, BCUOMA has significantly increased the recovery rate of used oil, oil filters and oil containers in British Columbia, and since 2011, with used antifreeze materials. BCUOMA is also monitoring some industry trends and the impact on its performance measures. For example, more oil filters are now being produced and sold in a lighter paper form versus metal. These lighter-weight filters significantly contribute to the reason why absolute tonnes of filters collected are dropping and therefore careful consideration needs to be made to calculating the weight of the product sold. In addition, oil and antifreeze service intervals in vehicles is getting longer (e.g. 10+ years between changes). This trend will effect annual recovery rate calculations, and consideration is therefore given to setting absolute recovery targets.

Figure 1: Recovery Rates since 2004 (since 2011 for antifreeze)



BCUOMA maintains and monitors the RI program to stimulate the collection and recycling of used oil and antifreeze materials, and will continue to work to improve the operating requirements of Collectors and Processors to ensure the integrity of oil and antifreeze materials collected and recycled.

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Table: Collection Performance by Regional District – 2013

Regional District	Oil		Filters		Containers		Antifreeze	
	L	L/Capita	KG	Kg/capita	Kg	Kg/capita	L	L /capita
Alberni-Clayoquot	424,097	13.81	27,287	0.89	22,299	0.73	23,395	0.762
Bulkley-Nechako	606,380	15.32	43,855	1.11	28,268	0.71	25,622	0.647
Capital	2,880,069	7.76	191,802	0.52	103,863	0.28	265,790	0.717
Cariboo	1,012,461	16.15	58,146	0.93	49,537	0.79	45,472	0.725
Central Coast	57,651	17.97	2,784	0.87	1,158	0.36	1,335	0.416
Central Kootnay	1,261,268	21.54	70,670	1.21	32,904	0.56	16,053	0.274
Central Okanagan	2,202,885	11.93	140,621	0.76	94,083	0.51	123,993	0.672
Columbia – Shus.	787,509	15.54	47,075	0.93	26,828	0.53	26,489	0.523
Comox Valley	882,315	13.81	56,770	0.89	46,392	0.73	48,671	0.762
Cowichan Valley	634,418	7.76	42,250	0.52	22,879	0.28	58,548	0.717
East Kootenay	1,224,428	21.54	68,605	1.21	31,943	0.56	15,584	0.274
Fraser Valley	2,308,529	8.02	146,490	0.51	63,522	0.22	139,596	0.485
Fraser-Fort Geo.	2,149,808	22.79	111,642	1.18	105,913	1.12	77,607	0.823
Metro Vancouver	19,674,133	8.02	1,248,441	0.51	541,358	0.22	1,189,688	0.485
Kitimat-Stikine	698,320	18.50	46,254	1.23	26,157	0.69	25,613	0.679
Kootenay – Bound	657,597	21.54	36,846	1.21	17,155	0.56	8,369	0.274
Mount Waddington	159,437	13.81	10,258	0.89	8,383	0.73	8,795	0.762
Nanaimo	1,377,146	9.23	90,588	0.61	57,901	0.39	108,577	0.728
North Okanagan	971,826	11.93	62,036	0.76	41,506	0.51	54,701	0.672
Northern Rockies	1,150,986	189.43	35,044	5.77	21,942	3.61	19,263	3.170
Okanagan – Smil.	964,009	11.93	61,537	0.76	41,172	0.51	54,261	0.672
Peace River	4,164,154	65.52	174,199	2.74	85,791	1.35	106,160	1.670
Powell River	368,281	17.97	17,782	0.87	7,401	0.36	8,528	0.416
Skeena-QC	217,571	11.72	17,489	0.94	11,702	0.63	9,578	0.613
Squamish-Lillooet	481,450	11.93	30,733	0.76	20,562	0.51	27,099	0.672
Stikine	118,584	189.43	3,611	5.77	2,261	3.61	1,985	3.170
Strathcona	603,239	13.81	38,813	0.89	31,718	0.73	33,277	0.762
Sunshine Coast	346,278	11.93	22,105	0.76	14,789	0.51	19,491	0.672
Thompson-Nicola	1,565,284	11.93	99,920	0.76	66,852	0.51	88,105	0.672
TOTAL	49,950,111		3,003,651		1,626,240		2,631,643	

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3.7 Dispute resolution

BCUOMA does not have any signed contracts with collectors, processors or generators, including return collection facilities. However, BCUOMA will not pay RIs to processors unless they are registered with BCUOMA and have agreed in writing to abide by its requirements, including the Manual for Collectors & Processors, and the Incentive Program for Collectors and Processors. Both of these documents are posted on www.usedoilrecycling.com.

If there is a dispute between BCUOMA and a processor, the processor can take the following actions:

1. Bring the dispute to the Executive Director.
2. Ask that the BCUOMA Board consider the issue
3. If the matter is not resolved at the previous two levels, processors can use normal commercial legal procedures such as the Commercial Arbitration Act.

BCUOMA is the only stewardship agency in British Columbia that has a local government representative and a member-at-large representative on its Board. This type of representative helps to provide the local government and not industry input directly at the Board level, including the resolution of any disputes or concerns by collectors and processors, local governments, producer members or the public.

4 Partners

BCUOMA has been using strategic partnerships to maximize economies of scale and seek value. BCUOMA and the Alberta Used Oil Management Association share the same program administration staff. BCUOMA and the other Used Oil Management Associations across Canada work to develop a common interface for our members, many of which operate in all Canadian provinces. BCUOMA is also working with the 20+ stewardship programs and the Recycling Council of BC to continue collaboration on a number of important initiatives that produce value for all.

5 Performance measures

Over the past three years BCUOMA has been engaged in the process directed by the BC Ministry of Environment to implement independent verification requirements for all product stewardship program annual reports. This exercise has been beneficial in that BCUOMA has been able to increase the assurance level of the data reported in its annual reports.

This exercise has also assisted BCUOMA in pointing out some challenges in how BCUOMA reports its recovery rates. Oil and antifreeze are semi-consumable products where the post use state is often very different than the pre use state. For example, used oil typically contains water, solids and other contaminants that change the make-up of the product where it no longer looks or can be measured in a way that it compares to the original the original product. Antifreeze is sold in different concentrations, the consumer can often add water during use, all of which alter the post-consumer state and volume of the product making comparison to the pre-use state very difficult. Oil and antifreeze containers are sold in

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various sizes and shaped and reported in units sold. As well, manufacturers of oil filters have developed better designs and methodologies that use less material in the manufacturing process that will result in less weight having to be recycled.

As such, BCUOMA is proposing to refine its performance measures for oil and antifreeze to increase the accuracy of reporting and verifiability by the independent auditor. BCUOMA is an established and comparatively mature program in BC is therefore proposing to set targets that reflect the maturity of the program and demonstrate its commitment to continuous improvement. By tracking and reporting on absolute collection for oil and antifreeze, and setting targets for end of life management, the program will more effectively achieve its goals and meet Ministry of Environment requirements.

BCUOMA will continue to collect and report recovery rate data and present this for easy to read and understand public information that approximates the performance of the BCUOMA program.

Collection Targets for 2014-2020

	2013	2014 – 2020
Used Oil (Millions of Litres)	50.0	2% increase year over year
Filters (Recovery rate (%))	83	1% increase year over year
Containers (Million KG's)	1.63	2% increase year over year
Used Antifreeze (Millions of Liters)	2.63	5% increase year over year

Note: Targets are based on economic growth projections in BC that may need to be adjusted over time

Collected products are managed in accordance with the Pollution Prevention Hierarchy. Oil previously sold as lubricating oil is collected, refined and reused as lubricating oil. Some oil is collected, transformed and recycled as a new energy product. Metal filters are collected and recycled into other metal products. Paper filters that can't feasibly be recycled are managed so a portion of the inherent energy can be recovered. Antifreeze previously sold as an antifreeze product is refined and reused as an antifreeze product. Plastic and metal containers are recycled into new plastic and metal products.

Management Targets for Product Collected 2014-2020

	Reuse	Recycling	Energy Recovery
Used Oil	50%	50%	
Filters		80%	20%
Used Antifreeze	100%		
Containers		100%	

Notes:

Oil: Oil is re-refined into new lubricating oil or recycled as an energy product

Oil Filters: all collected metal filters are recycled; paper filters are managed through energy recovery.

Containers: all collected containers are recycled into new plastic or metal products

Antifreeze: all collected antifreeze is refined for reuse.

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Consultation Summary

The British Columbia Used Oil Management Association (BCUOMA) conducted a consultation of the 2015 – 2020 draft Stewardship plan between October 7th and November 21st, 2014.

As a mature and successful stewardship program BCUOMA focused the plan and consultation on improving performance measurements to comply with ministry requirements for independent verification, augment existing – and successful – collection and processing systems, and reflect industry’s improved product design for environment.

Stakeholders were notified of the opportunity to participate in commenting on the draft plan through:

- posting on the BCUOMA website with direct links to the draft plan and the webinars;
- direct emails to all BCUOMA members, and collectors and processors;
- notification of the Coast Waste Management Association and the Recycling Council of British Columbia and their respective members including environmental organizations, business associations and local governments; and,
- notifications of other stewardship agencies in BC to provide input.

Stakeholders were also invited to provide input through the online blog, or through direct email to BCUOMA’s Executive Director, David Lawes. Consultation included two webinars on October 30 and November 6, 2014. The list of webinar registrants is attached (Appendix I).

A summary of the written submissions and BCUOMA’s responses is attached (Appendix II).

APPENDICES

Appendix I Webinar Registrants

Appendix II Consultation Written Questions and Responses

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Appendix I – Webinar Registrants

Oct 30th, 2014 Registrants

First Name	Last Name	Email
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Nov 6th, 2014 Registrants

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