



Our File No. 5360 04 19

December 21, 2017

BC Used Oil Management Association
ATTN: David Lawes

Dear Mr. Lawes,

Re: BCUMOA Consultation Feedback

The Regional District of Kitimat-Stikine submits the following in response to call for feedback related to the BCUOMA Plan Consultation.

The Regional District of Kitimat-Stikine is roughly 104,000 square kilometers in size and includes 5 member municipalities. The majority of our member municipalities and none of our Electoral Areas would have been included in the MNP study concluding that 99 percent of the population of BC live within driving distance of a facility. Used oil collection centers in the Regional District are limited exclusively to the Greater Terrace area. 5 collection facilities exist all within a small, 5 kilometer area. There are no other used oil collection facilities in the Regional District of Kitimat-Stikine, including larger member municipalities such as Kitimat (Pop. 8335) or more remote areas such as Stewart or Dease Lake.

When Canadian Tire pulled out of the used oil take back program, while a huge blow provincially, we in the Regional District of Kitimat-Stikine were only mildly affected as there is only 1 Canadian Tire location in the Regional District. To say that we were only mildly affected however is merely a reflection of just how poorly the area is served by the program to begin with. While there have round up events in the past where used oil was collected, these events were not initiated by BCUMOA and are far too infrequent to serve as a reliable means to collect materials from the Region. Compounding the problem of a lack of used oil depots is the fact that many people in remote or rural communities service their own vehicles. Rural residents are not taking their vehicles to automotive shops for routine fluid services in the same numbers encountered in more urban environments. This culture requires that more facilities be available for the Do-It-Yourselfer for responsible drop off of materials and to avoid these materials being deposited in landfills or backroad dumpsites due to a lack of appropriate facilities.



Regional District of
Kitimat-Stikine

300-4545 Lazelle Avenue
Terrace, B.C. V8G 4E1
Tel 250-615-6100
Fax 250-635-9222

BUCOMA needs to reach out to retailers of products managed under the program; to gas stations and service centers and make the incentives for hosting a depot more attractive. The reasons given by Canadian Tire for withdrawing from the program included being inundated with products not included in the program or receiving contaminated material. Locations hosting these depot facilities must be supported by the Stewardship in ensuring that public education is made available and distributed to discourage misuse of the depot.

The Regional District understands that if no suitable retailers or private entities are willing to become depot locations, the Regional District may host drop off sites at our Waste Management Facilities. This may be an appropriate and secure response to the issue of long term management of the program moving forward; however support and incentives must be made available to the Regional District before such an undertaking is considered.

The Regional District recognizes that an \$8000 grant is available to support installation of infrastructure, including a tank, for a depot facility. The Regional District feels this is an extra, and rather unnecessary step to be assumed by staff. Rather, the Regional District feels that funding should be made available through the Stewardship directly for approved locations. The Stewardship should endeavor to make siting of facilities at approved locations as easy an exercise as possible. Streamlining this process could include BUCOMA providing the local government storage tanks for the facility rather than the facility operator having to apply for grant funding and source a tank themselves.

The Regional District is willing to examine the possibility of hosting a drop off facility at landfills and transfer stations to serve remote, rural communities, however, such a facility should not be built or maintained through the service fees or taxation of local residents. The funding for development and operation of the facility should be transparent and made available to the local government by the Steward, rather than through a grant application.

Yours Truly,



Murray Daly
Solid Waste Services Coordinator