

To David Lawes – Executive Director, BC Used Oil Management Assoc.:

This note is a submission to the proposed 2017 BCUOMA Stewardship Plan. This response focuses on how the Stewardship Plan will manage consumer collection facilities.

The RDKB's comments are as follows:

Financial incentives: Over the years, most service stations in the RDKB have participated in BCUOMA consumer collection program but have discontinued their involvement 'because we were billed to have someone eventually pick up the oil'. Some service stations continue to collect used oil but charge residents a drop off fee (outside the program). Some appear to be using used oil as heating fuel as this use is more financially viable than the collection incentives offered by the BCUOMA program.

The proposed BCUOMA Plan will need to determine sufficient incentive levels to collectors to overcome alternative options. The current level of \$.30 per litre might work in some high volume locations but not necessarily rural BC. More research needs to be done to determine appropriate levels of financial incentives.

Proper collection and handling of oil products requires constant oversight by trained staff. The financial incentives proposed are likely insufficient to fully compensate businesses for their effort on behalf of BCUOMA.

Lack of Public Education

RDKB staff receive several enquires per week from residents who are not aware of where to return oil/antifreeze stewardship products. Despite an on-line presence and a relationship with the Recycling Council of BC, BCUOMA's program is unknown to many do-it-yourself oil changers in rural BC – especially the drop site locations. Most residents are aware that used oil must be disposed of properly but need to know where the drop site locations are located.

The BCUOMA Plan needs to propose concrete ways to communicate directly with rural residents who use oil products, but not necessarily computers. Perhaps there needs to be a greater focus on placing education materials directly on the product, product packaging, or at the point of sale.

Insurance: The RDKB hosted a BCUOMA drop site until 2015 and found that the financial incentives were insufficient to adequately fund staff oversight and infrastructure for the proper handling of this toxic product. Assistance for site closure and rehabilitation from BCUOMA was non-existent and hostile. It appears that many former BCUOMA drop site locations have legacy damage resulting from their involvement with the used oil stewardship program. The proposed Plan seeks to absolve BCUOMA of past practices and protects brand holders from liability in the future. We would instead ask that BCUOMA acknowledge the damage caused by past BCUOMA depot management practices and provide funding to former drop sites for rehabilitation efforts.

Infrastructure:

The proposed Plan allows for collectors to be eligible for infrastructure grants to construct a compliant facility. The proposed \$8,000 is a good start but likely will not cover the full cost of the needed infrastructure.

The experience of regional districts of Columbia Shuswap and Thompson Nicola (from \$30 – \$70,000 per site) show that much more funds are needed. The Plan needs to allow for greater Steward investment focused at the right facility.

The infrastructure grant program seems to target local governments to host BCUOMA depots as market fluctuations etc. make the BCUOMA site uneconomical for the private sector. The infrastructure funding model should be focused on establishing a series of stable private sector depots.

As a suggestion, perhaps BCUOMA could partner with an established franchise/brand like Petro Canada/ Canadian Tire/ Lordco to establish drop sites at every retail location. There is no reason why local government waste disposal facilities are, in any way, an appropriate receiving site for used oil stewardship materials.

Minimum service level for collection facilities.

The proposed Plan also references a User Intensity Matrix study that determines the minimum number of collection facilities needed to fulfil the regulated requirement. This model has shortcomings and would be unnecessary if the proposed business model had sufficient financial incentives to create competition for BCUOMA 'franchises'.

This matrix seems to justify a proposal for an unprecedented reduction of service levels in resident's access to the steward's collection facilities.

Container/filter returns

RDKB landfill staff anecdotally estimate that each commercial hauler brings in excess of 10 empty (or maybe even full !) oil containers. Commercial garbage bins from service stations bring substantially more. There is not a single convenience store/service station in the RDKB which offers customers who buy a litre of oil, an immediate proper disposal container.

As well, backyard oil changers have no incentive to properly dispose of their anti-freeze or oil containers.... In fact they have more incentive to return their empty Budweiser cans than their toxic empty oil container. As a suggestion, perhaps BCUOMA could create a deposit/refund program for containers, filters and even used oil. If residents had proper incentive to return these containers to a place where they would get their refund, they would never abandon oil in parking lots or beside dumpsters.

Auditing

Whereas the RDKB only describes anecdotal estimates of how many BCUOMA managed products are ending up in local government operated landfills, we would like to see BCUOMA commit to partnering with landfill operators throughout the Province to conduct regular waste audits to determine the real success of the stewardship program.



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