

## **APPENDIX B: EPR Plan Consultation Process, Feedback and Responses**

### **Term: 2023 – 2027**

An overview of the 2022 EPR Plan Consultation Process was posted on the BCUOMA website on September 7, 2022 for all stakeholders to review. <https://bcusedoil.com/2022-epr-plan-consultation/>

### **Public Consultation Period: September 7 to November 1, 2022**

BCUOMA offered the following consultation opportunities over the period.

#### **Virtual Consultation Sessions:**

- # 1: Wednesday, September 28, 2022
- # 2: Tuesday, October 4, 2022
- # 3: Tuesday, October 18, 2022 for BCPSC members

#### **In-Person Consultation Sessions:**

- # 1: Thursday, September 22, 2022 for attendees at the Southern Interior Waste Managers Association (SIWMA) Conference in Salmon Arm, BC (for registered conference attendees only)
- # 2: Wednesday, October 26, 2022 at the Coast Waste Management Association (CWMA) Conference in Victoria, BC

#### **Other ways to provide feedback:**

- Via Online Survey – [LINK](#)
- Via Online Forum on bcusedoil.com – [LINK](#)
- Via email to [dlawes@bcusedoil.com](mailto:dlawes@bcusedoil.com)

### **Consultation Feedback and BCUOMA Responses**

The table beginning on page 3 summarizes the EPR Plan feedback received through all components of the consultation process together with BCUOMA's responses, where applicable. While the content focuses on suggestions for change, BCUOMA was also commended in several areas including being a global leader in EPR programs, making improvements to its existing system (collection sites, compensation), including a member at large and a municipal representative on its Board, working with First Nation communities to improve collection infrastructure, offering infrastructure grants, and developing its own accessibility standard that is an improvement on the SABC model.

Note that some lengthy written comments received by BCUOMA have been condensed without the intent of distorting the original messaging. To ensure transparency, the Ministry of Environment and Climate Change Strategy (Ministry) has separately received copies of the full text of all emailed comments as well as a listing of all consultation participants.

Any comments made through the online survey are also included in the table. With seven survey responses received, the results were that 86% of respondents confirmed their support of the draft Plan. The one respondent that did not support the Plan provided no explanation for their opinion.

Themes in the consultation feedback include:

- Expanding representation on the BCUOMA Board
- Tying EHCs to material recyclability to drive change
- Gathering more data on the “bad behaviour” of consumers
- Getting a better understanding of unavailable products especially from re-purposing
- Increasing collection sites / accessibility
- Improving container labelling
- Encouraging material re-use and recyclability, eliminating burning
- Increasing participation in waste audits
- Recognizing the true costs of being a collector and compensating accordingly
- Increasing consumer awareness targets

BCUOMA acknowledges the exclusion from the table of some comments that cannot be addressed in this consultation process as they will require input from and the support of external entities or they are of an operational nature. A summary of these other comments is included below the table, broken down by:

- Decisions that would fall under the Ministry’s authority
- Recommendations requiring collaboration with other agencies
- Operational matters for separate consideration

### Consultation Feedback

Comments (by Plan Topic)	Comment Source(s)		BCUOMA Responses / Actions
	# Local Government	# Service Provider/Other	
Legal Requirements (Products Covered)      Comments below are from 2 unique Local Governments			
1. Regarding previous discussions on including additional containers in the program, is there anything in the new Plan to follow up on that?	1 <i>Cariboo Reg District</i>		On Oct. 17, the Ministry announced that they will add them by 2026. Until then BCUOMA will continue, without payment, to process these containers as contaminants.
2. We recommend BCUOMA clarify that it handles the residual material left in accepted containers, in addition to the residual oil.	1 <i>District of Squamish</i>		The products covered are outlined in Section 5 of the Plan.
Governance & Financing (Board, EHCs)      Comments below are from 2 unique Local Governments, 3 unique Service Providers/Other			
1. BCUOMA is commended for a member at large and a municipal representative on its Board. In addition to this, the Board would ideally represent a wider range of stakeholders including reuse and repair organizations, recyclers, other local governments, First Nations and environmental NGOs. (Alternately BCUOMA could form an advisory committee consisting of these types of members that would report to the BCUOMA Board.)	2 (similar) <i>District of Squamish &amp; Cariboo Reg District</i>	1 <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
2. BCUOMA should further develop variable EHCs based on certain criteria such as lifespan, use of refillables and reusable containers, use of easy to recycle materials (vs materials wasted by being burned for energy), etc. to drive product design change as intended by the CCME. The program could incentivize reusable containers and then those that are actually recyclable, phasing out eco-boxes as well as PVC pouches and try to prevent biodegradable forms of packaging from being used with prohibitive fees. As the Desrosiers report notes, developing standardized containers with a focus on reuse is feasible.	1 <i>District of Squamish</i>	1 <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.

Comments (by Plan Topic)	Comment Source(s)		BCUOMA Responses / Actions
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3. There is a troubling discrepancy between BCUOMA reporting and the DesRosiers findings regarding the recyclability of contaminated containers. Clearly, much of the BCUOMA packaging is not being recycled. In this case, EPR fees should be used to prohibitively price non-recyclable packaging, including “eco-boxes”. EPR fees should be used to incentivize Reuse containers.		1 <i>Nanaimo Recycling Exchange</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
4. BCUOMA producers who are responsible for the oil filters that cannot be recycled, and must be incinerated, should be paying fees that are high enough that there is a real incentive for them to change their products.	1 <i>Cariboo Reg District</i>		Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
5. The fees should also be set at a higher level to pay for the improvements needed in understanding collection rates, providing more comprehensive collection networks, enhancing awareness and fulfilling the mandate for redesign and reuse.		1 <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
6. Suggest there be a deposit on empty oil containers as they are messy to handle and take up a lot of space.		1 <i>Pender Island Recycling Society</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
<b>Product Available for Collection</b> Comments below are from 4 unique Local Governments, 2 unique Service Providers/Other			
1. The program may wish to do user surveys to understand where and why materials may be uncollected. The 2018 BC survey noted that 39% of residents found recycling used lubricating oil, filters and containers very convenient and another 37% found it somewhat convenient. A target to raise this number as well as an annual survey to measure it would be useful. The survey also noted that up to 10% of respondents may throw program products in the garbage. When asked why these items may have been thrown in the garbage, 23% did not know the item was recyclable, 38% did not know where to take it and 17% said there was nowhere to take it or no way to get it there. This shows some key areas that this program plan should address.		1 <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.

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2. Looking at the recovery rates in the DIY sector vs. Commercial, it would be good to get more data on the bad behaviour of the general public (e.g., throwing away, pouring down the drain).	<b>1</b> <i>Metro Vancouver</i>		The challenge with the recovery rate on the DIY/consumer side is that we can measure the collection but not the sales. That's because we don't know for sure which side of the business (commercial/RCF) the oil purchased off the retailer's shelf will be collected from. We do know the consumer side is where we have more issues in terms of bad behaviour and we're working to educate the public better on what not to do.
3. The program could pursue disposal bans with local governments as a way to ensure consumers do the right thing but also that they are aware that throwing these products away is not appropriate. More research should be done on the portion of product that is not collected to understand who is not participating in the program and what marketing and behaviour change initiatives are needed.	<b>1</b> <i>District of Squamish</i>	<b>1</b> <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
4. Lubricating Oil - The study on consumption in use is helpful and should be used to identify ways the program could minimize loss (such as leak detection and prevention). Used Oil - The program should also look at ways to minimize the other uses (repurposed oil) where the oil may be burned without proper environmental and health protections.	<b>1</b> <i>District of Squamish</i>	<b>1</b> <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
5. 26% of used oil being re-purposed annually is a significant amount. Since fees are being collected on these liters that are not being captured, does BCUOMA have plans to gather further information on re-purposing and end-use of these liters and perhaps identify potential environmental concerns from improper re-purposing of used oil?	<b>1</b> <i>Cariboo Reg District</i>		BCUOMA Unaccounted Used Oil Study can be found on our website: <a href="https://bcusedoil.com/app/uploads/2020/09/2018-Unaccounted-Used-Oil-Study.pdf">https://bcusedoil.com/app/uploads/2020/09/2018-Unaccounted-Used-Oil-Study.pdf</a>
6. We appreciate that BCUOMA will conduct studies on what is "available for recycling" and feel that having third party oversight or verification of the process, definitions and standards used will enhance the trust in BC's EPR system.	<b>1</b> <i>District of Squamish</i>	<b>1</b> <i>Zero Waste BC</i>	We agree trust is important and are pleased to share that, based on survey results, BCUOMA has achieved a high level of public trust in its system (currently at ~85%).

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7. How often are unavailable product studies done, and where can we find them? Also, if you're not sure about the unavailable volumes, is it appropriate to use the numbers you do?	<b>1</b> <i>Comox Valley Regional District</i>		Every 2 to 3 years. While some are conducted solely by BCUOMA, we often work with other used oil programs across Canada as our circumstances are similar. Reports from completed studies are posted on the BCUOMA website. <a href="https://bcusedoil.com/participants/resources-reports/">https://bcusedoil.com/participants/resources-reports/</a> We believe BCUOMA is using the best possible science based on available information.
8. Do you conduct consumed in use studies for antifreeze like you do for used oil?	<b>1</b> <i>Metro Vancouver</i>		Yes. While we're confident that the antifreeze not captured through our program is not being improperly managed, we recognize that we need to know more. Most of our past antifreeze studies have been conducted nationally but we are looking to do more BC-based studies so we can focus on what's happening here in the province.
9. What do you expect the impact of the increasing number of electric vehicles on the road to be on the BCUOMA program?		<b>1</b> <i>Nickel Bros</i>	We do think that in time we will have less oil coming from that stream, however we also expect the focus on older vehicles to shift and people will be working to keep them on the road for longer. That is something we will be monitoring closely.
<b>Collection</b> (Commercial, Consumer/RCFs, Accessibility, Collection Events) Comments below are from 3 unique Local Governments, 3 unique Service Providers/Other			
1. If EHCs are collected for small container products (30L of used oil for example), that suggests the program is consumer funded. If that is so, then where do funds originate that BCUOMA provides to commercial collectors and processors "based on collection volumes and locations"?		<b>1</b> <i>Nanaimo Recycling Exchange</i>	An Environmental Handling Charge or EHC funds the recycling program. This fee is a charge paid by the first seller to help collect used oil, oil filters, oil, and antifreeze containers and used antifreeze from BCUOMA's network of public collection facilities and generators around the province.
2. A survey of the collection network should be done to understand what areas could be improved from both a collector and customer perspective. This network is an asset and using the collective	<b>1</b>	<b>1</b> <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.

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knowledge would be advantageous. Metrics on customer satisfaction and collector satisfaction should be added to the program with targets suitably high for such an established program. A secret shopper (or dropper) program should be implemented to understand the consumer experience and if the collection sites are welcoming of products. Research should also be done to understand what products are not accepted and how to minimize that (such as poorly labelled containers).	<i>District of Squamish</i>		
<b>3.</b> How do you react to dropping oil prices? Is there a way to make sure you react more quickly?	<b>1</b>  <i>Metro Vancouver</i>		We are reluctant to be too reactionary to the market changes as we also need to focus on consistency. That said, the last major price drop led us to re-evaluate our public collection network and how we could create better resiliency and quality in those locations. As a result, we have invested in these facilities, providing infrastructure and support, to ensure they are more likely to stay in the program network.
<b>4.</b> BCUOMA has been doing well in improving its public collection sites and increasing the compensation. It has also been working with First Nation communities to improve its collection infrastructure. It is appreciated that BCUOMA has developed its own standard that is an improvement on the SABC one however, the target for coverage should be that 100% of the population has access to either a collection depot or a pick-up system to return the product and packaging (free of charge to the end user). BCUOMA's new standard should be developed in consultation with local governments, First Nations communities and the public, and meet the intent of the Recycling Regulation. Programs should provide service in all municipalities and if no service provider can be contracted, the program itself should set up the collection depot.	<b>1</b>  <i>District of Squamish</i>	<b>1</b>  <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.

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5. Opening up more commercial and residential collection sites will help to reduce the demand on any individual site and make it easier for residents and businesses to find a convenient collection. Accessibility and equity should be a key factor in setting up new collection sites.	<b>1</b> <i>District of Squamish</i>		Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
6. Why doesn't BCUOMA work with the retailers who sell the product to create collection sites?		<b>1</b> <i>unknown-SWIMA</i>	Our focus is to seek out committed partners with high quality sites in effective locations including retailers, when appropriate.
7. Currently in the BC interior there is only one registered collector for BCUOMA. In the program plan there needs to be additional language on BCUOMA increasing the number and availability of collectors to build the capacity of the BCUOMA collection network.	<b>1</b> <i>Columbia Shuswap RD</i>		BCUOMAs Collection rate is high province-wide and absolute collection in the interior has remained stable. The program is designed so adjustments can be made to the incentive program should collection performance not meet our objectives
8. There are problems with the accuracy of the Google-based search tool when it comes to the RCF hours of operation.	<b>1</b> <i>Regional District of Bulkley-Nechako</i>		BCUOMA is aware that there have been issues and has stressed to the RCFs the importance of keeping their information updated to ensure its reliability.
9. When drawing the line between DIY and Commercial, where do the small repair shops fall in the data?		<b>1</b> <i>Productcare</i>	We see them falling in the middle. Sometimes they have their own relationship with a collector, but we also allow them to bring product to an RCF, as long as they follow the limits of their chosen RCF (maximum litres, etc.)
10. We encourage BCUOMA to share more broadly the Community Collection Event program, as this is not commonly known in many communities. The number and location of contracted sites by city and RD should be provided as well as a list of any municipalities that do not have a permanent depot.	<b>1</b> <i>District of Squamish</i>		BCUOMA is an active member of a working group of SABC and BCPSC members committed to sharing awareness of collection events and other program information. We also offer grants to help fund these events and offer promotional/advertising support as part of the grant program.
11. Events should be used as marketing tools to raise awareness rather than counted as part of accessibility as people are unlikely to	<b>1</b>	<b>1</b> <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.



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store the materials until an event (often irregularly and sporadically timed) may occur.	<i>District of Squamish</i>		
<b>12.</b> The data on collected volume/units should be available to local governments, either by request or published in the annual report. As regional districts and municipalities are responsible for developing their own waste reduction and Zero Waste plans, this level of data is incredibly useful to identifying gaps.	<b>1</b> <i>District of Squamish</i>		This information is included with each annual report. The 2021 results are available at: <a href="https://bcusedoil.com/app/uploads/2022/06/Summary-of-2021-Collection-and-Consumer&gt;Returns.pdf">https://bcusedoil.com/app/uploads/2022/06/Summary-of-2021-Collection-and-Consumer&gt;Returns.pdf</a>
<b>Transportation &amp; Processing</b> (Incentives, Collection Targets, Prod. Mgmt., Audits) Comments below are from 3 unique Local Govts., 2 unique Service Providers			
<b>1.</b> “The incentives provided by BCUOMA are actively managed and reviewed by the association to ensure the desired outcomes are being achieved.” It doesn’t seem that desired outcomes of Unaccounted For products are being achieved. It is 18.76M litres of lost product because the financial incentives for sending to a cement kiln have likely surpassed the financial incentives for actual recycling.		<b>1</b> <i>Nanaimo Recycling Exchange</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
<b>2.</b> Are there any changes planned for the incentive rates? Our location is struggling to receive service from our collector.	<b>1</b> <i>Thompson-Nicola Regional District</i>		The rates were increased last year and are reviewed regularly. If you are not getting adequate service, reach out to your service provider to work out a service schedule that meets your need. Service providers are currently facing scheduling challenges due to a shortage of drivers as well as supply chain issues that delay the delivery of new trucks/parts.  If you are unable to reach an agreement with your service providers on an acceptable collection schedule, please reach out to our office and we can work with you and the service provider to resolve outstanding issues
<b>3.</b> We appreciate that BCUOMA is offering grants for infrastructure and think that the program should be paying 100% of the program-specific costs.	<b>1</b> <i>District of Squamish</i>	<b>1</b> <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.

Comments (by Plan Topic)	Comment Source(s)		BCUOMA Responses / Actions
	# Local Government	# Service Provider/Other	
4. The program is commended for having different collection zones. The plan notes this is part of an incentive system, but the plan makes no mention of how the incentives work, how they are different, if they cover all of the costs of collectors and if they are effective.	<b>1</b>  <i>District of Squamish</i>	<b>1</b>  <i>Zero Waste BC</i>	The BCUOMA incentives are intended to support the free market collection of materials and ensure no cost drop off locations are available to consumers. The high rates of recovery of available materials and low turnover of program registrants who receive these incentives have demonstrated the effectiveness of these incentives over the past 19 years of program operations. Rates are monitored regularly and adjusted as required to meet changes in market conditions.
5. Section 7.3 has a table labelled targets but the table seems to reflect existing collection levels. While the regulation does state 75% collection as a baseline it also notes the ability of the director to set higher targets which they should for mature programs. The ultimate target for filters and containers should be 100%. Given that oil, antifreeze, and other products in containers may be consumed, other methods such as audits and surveys should be used to understand what products may be going uncollected. More detail on the “repurposed” aspect should be gathered and it should be included in the reporting. Work should be done to encourage reuse of the materials and discourage burning of them.	<b>1</b>  <i>District of Squamish</i>	<b>1</b>  <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
6. The TNRD would like to see BCUOMA increase its capture rates over the term of the Plan. The draft Plan indicates that BCUOMA believes that it captures greater than 75% of its program materials. Why not increase that target in subsequent years to reflect increased capture rates? For example, if 75% is achieved over two consecutive years then increase the target capture rate to 80%? Once 80% is achieved over two consecutive years then increase the target capture rate to 85%, etc.	<b>1</b>  <i>Thompson-Nicola Regional District</i>		Please see the Supplementary Document “Performance Measures, Targets and Reporting Commitments-Term: 2023-2027” linked from the draft Plan’s table of contents. The target Capture Rates for the current term are projected from the 2019-2021 results and as such are substantially higher than 75% in all cases except antifreeze.
7. Section 7.4 Product Management - The Zero Waste Hierarchy should be used to develop systems for the products to be redesigned, reduced, reused and recycled. As noted above, reusable containers	<b>1</b>	<b>1</b>  <i>Zero Waste BC</i>	The definitions used by BCUOMA are consistent with those used by the industry internationally and

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are preferable. It is good that antifreeze and lubricating oil can be recycled back into its original purpose but should there also be a system to reuse any residuals that are in their original state without refining being necessary. The programs should look to understand why some oil cannot be recycled back into lubricating oil and work to address those challenges with a goal to stop burning it. Similarly, can more filters be shifted to recyclable types and containers, when not reusable, be recyclable? The portion of oil that is used in burner units and as fuel for cement kilns needs to be reported separately and NOT counted as recycling. It should be phased out but until that time, it needs to be reported and accounted for separately as disposal. Similarly, “reuse” is for materials used in the same condition as they were returned while recycling is for materials that are processed to ideally be used for similar purposes. This use of language in the table under 7.4 must be rewritten and highlights the need to have the Ministry define these terms in the Recycling Regulation to avoid greenwashing and increasing consumer distrust. Work should be done to develop reuse systems for filters as well as research on how to design products to be less toxic, require less of the product or have it last longer.	<i>District of Squamish</i>		we report using those definitions annually. Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
<b>8. Oil Filters</b> - The program should work to minimize the non-recyclable components of oil filters so that waste to energy is no longer used. <b>Containers</b> - We encourage BCUOMA to work with producers and large volume consumers to reduce the number of containers required for recycling, including refill options, and larger bulk containers to reduce the impact of these containers.	<b>1</b> <i>District of Squamish</i>	<b>1</b> <i>Zero Waste BC</i>	Our program works with producers and our program fees reflect the costs of managing the designated products. All waste to energy uses must be approved under provincial regulations and permits. We encourage our members to design products with end of life management in mind but recognize that the nature of the products and their usage requirements will also influence product and packaging design specifications.
<b>9. Section 7.5 Landfill Audits</b> - The use of waste composition audits going forward is useful to see if the containers and filters are being	<b>1</b>	<b>1</b>	BCUOMA partners with other programs on annual waste audits through the Stewardship Agencies of

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captured by the program, and the program should partner with other programs to conduct composition studies annually across BC. The results should be published on the BCUOMA website, and the details of the studies should be included in the annual report to the BC Government and made public. This data should be used to understand the degree of success of collection given the challenges and estimates of what is available to collect noted in the plan. Any local government or First Nation's government who requests assistance in funding a waste audit that includes BCUOMA products should receive appropriate funds and not need to go through the SABC request system.	<i>District of Squamish</i>	<i>Zero Waste BC</i>	BC (SABC). In the Plan, BCUOMA has committed to reporting on any findings that are relevant to its products.
<b>10.</b> In the EPR plan it states that BCUOMA participates in landfill waste audits with local governments. In 2021 the CSRD reached out to BCUOMA to participate in the Salmon Arm landfill waste audit and did not receive any funding or cooperation from BCUOMA. Will the Ministry be enforcing the BCUOMA's EPR approved Plans' commitment to participate in future waste audits?	<b>1</b>  <i>Columbia Shuswap RD</i>		As noted in the EPR Plan, BCUOMA participates in waste audits conducted through SABC.
<b>Paying the Cost of Collection &amp; Management</b> Comments below are from 6 unique Local Governments, 1 unique Service Provider/Other			
<b>1.</b> BCUOMA has a unique approach that is suitable as long as the accessibility, collection rates and retention of collectors is high. For collection sites, the assumption that labour, space, equipment, materials and others is part of the cost of doing business may be true for some collection sites but not for others (particularly those for whom collection is the goal and not 5 other aspects like oil changes). The program needs to prove that all collection sites are being adequately compensated for their services and in particular, that local and First Nation governments are not subsidizing the program by offering staffed collection depots, storage, insurance, etc.	<b>1</b>  <i>District of Squamish</i>	<b>1</b>  <i>Zero Waste BC</i>	<p>The BCUOMA program is unique in that 95% of the volume of materials collected are from commercial locations and that BCUOMA does not own the materials collected, leaving program participants to determine their own financial outcomes. The consumer collection component of the program leverages the economies of scale created by the commercial collection activities. Collection rates have been consistently high across all materials for total commercial and consumer collections.</p> <p>As noted in the plan, accessibility (free drop off) is considered the key performance metric for the 5%</p>

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			consumer portion of the program. We work with all RCFs, including local and first nation governments, by providing direct infrastructure support, return collection incentives and extra financial support to commercial collectors to offset the costs of RCF operations. These financial supports have resulted in low turnover and high satisfaction rates among these facilities. The rates and types of support are reviewed regularly to ensure that there are sufficient numbers and locations of consumer collection sites to continue to meet our accessibility targets while allowing the collection sites the ability to determine their own methods and costs of operation.
<b>2.</b> Care also needs to be taken that the end fates of the materials are in line with the program plan and it is not clear if this is part of the agreement as if the collector owns the product, it is assumed they sell it to the market. It is also not clear how this may need to change for items of lower value such as the additional forms of packaging or how incentives are changed in the event that the market rates for collected items are no longer sufficient to justify the collectors continuing as collectors or processors as processors.		<b>1</b> <i>Zero Waste BC</i>	BCUOMA does not offer a differentiated incentive to drive end fates that are determined by the collectors and processors but only supports end fates that are approved uses as defined by provincial legislation and regulations. Financial incentives provided by the program recognize that all collected materials do not have a positive market value at the point of collection and are reviewed and adjusted accordingly to ensure that collection and recycling rates remain high.
<b>3.</b> The previous plan amendment noted challenges with local governments collecting other HHW but not BCUOMA products. The program should work with local governments to understand what the rationale is for not collecting BCUOMA materials and work to address them. This may be more important as the program expands its product suite.	<b>1</b> <i>District of Squamish</i>	<b>1</b> <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.

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	# Local Government	# Service Provider/Other	
<p><b>4.</b> With the consultants and reports conducted to review the remuneration of the program, there never seems to be consideration on the true cost of being a collector. The CSRD operates three collection sites at our landfills that are in conjunction with our HHW depots. During operations of the HHW depot we still must have a site attendant to manage material even if no BCUOMA material comes in, but they must be available even if material does come to the site. Also, staff manages material that comes in when the HHW depot is closed with program material that is pulled from the active face and/or left abandoned. More consideration needs to be given to the overall costs of managing EPR programs, which the small incentive CSRD gets for managing the BCUOMA material does not cover the true costs of operating. Also, there is quite a bit of administrative component to being a part of the program including: scheduling pickup, managing manifests and providing semi-annual reports of material collected that is not factored into the cost of managing the program.</p>	<p><b>1</b></p> <p><i>Columbia Shuswap Regional District</i></p>		<p>Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.</p>
<p><b>5.</b> The CSRD is appreciative of the capital funding support received from BCUOMA to establish the hazardous waste depots at the CSRD's landfill facilities. However, BCUOMA now needs to conduct financial audits, similar to the work Recycle BC is doing, to understand the true costs of managing these depots. With the closure of so many historically operated receiving facilities (Canadian Tire, etc.) has resulted in the CSRD's hazardous waste depots becoming significant receiving facilities in our communities. As such, the funding model needs to be revisited.</p>	<p><b>1</b></p> <p><i>Columbia Shuswap Regional District</i></p>		<p>Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.</p>
<p><b>6.</b> The program may need to look more closely at its existing system to see if any changes are needed with the new suite of materials to collect regarding collection systems, processing, incentives and costs as well as looking to the future when electric vehicles are the norm.</p>	<p><b>1</b></p> <p><i>District of Squamish</i></p>	<p><b>1</b></p> <p><i>Zero Waste BC</i></p>	<p>BCUOMA monitors the system on an ongoing basis.</p>

Comments (by Plan Topic)	Comment Source(s)		BCUOMA Responses / Actions
	# Local Government	# Service Provider/Other	
7. You mentioned that BCUOMA has no ownership of the materials collected. Why is it that way and would changing it make a difference?	1 <i>Regional District of Central Kootenay</i>		The system works better in a free market. If BCUOMA took ownership of materials collected from consumers, it would also have to market those materials. This would mean having two separate approaches (commercial vs consumer) which would be inefficient.
8. The TNRD is confident that the RCF network would benefit from improved service levels provided by the Registered Collectors if BCUOMA were responsible for managing its program materials and collection. It is in the interest of BCUOMA to ensure that the RCFs are receiving adequate service levels. Currently, Registered Collectors are offering adequate service levels if the RCF pays an hourly rate for the equipment used to service the Facilities. Or alternatively if the RCF stockpiles inordinate amounts of program materials that generate enough revenue to cover the Registered Collectors costs. A solution to inadequate service levels would also be if BCUOMA paid the Registered Collectors enough to cover the costs of servicing the RCFs. This is does not appear to be the case in the Interior of BC.	1 <i>Thompson-Nicola Regional District</i>		Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
9. For remote and low volume collection facilities, in which containers and filters are not collected by the used oil collection vehicle, there should be a built-in payment in addition to the per liter price to compensate for transportation and drop off of containers at regional/centralized RCFs. Not once has a used oil collection truck picked up containers or filters from any of the Cariboo RD operated RCFs. The administrative burden of tracking the cost to load, transport and drop off these items from several facilities prevents the request for payment being made to BCUOMA, and the cost ends up being covered by the RD. If built-in payments are not feasible, then BCUOMA should identify other operators/contractors in the region that can be called to collect containers and filters and pay them directly for their services.	1 <i>Cariboo Regional District</i>		Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.

Comments (by Plan Topic)	Comment Source(s)		BCUOMA Responses / Actions
	# Local Government	# Service Provider/Other	
<b>10.</b> Would like a form to submit invoices for fees associated with the pickup of BCUOMA related products, and perhaps consider stipulating in the program plan that the collection site shall not incur costs, that the Collector shall submit the invoice directly to BCUOMA for additional costs associated with picking up material in those odd cases.	<b>1</b>  <i>Comox Valley Regional District</i>		Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
<b>Program Marketing &amp; Consumer Awareness</b> Comments below are from 3 unique Local Governments, 1 unique Service Provider/Other			
<b>1.</b> Are there any specific strategies for communications?	<b>1</b>  <i>Regional District of Fraser-Fort George</i>		Yes, BCUOMA will focus on better identifying and targeting the RCF users. This will include expanding communications to include trade media advertising in industries such as logging, farming and transportation and capturing information at roundups/community collection events. This enhanced approach means there will now be 2 awareness strategy streams, one for the general public and the more focused one for RCF users.
<b>2.</b> For a program operating as long as BCUOMA has, it is surprising that the level of consumer awareness is not higher. The 2018 BC report noted above found only 60% of residents were aware that used lubricating oil, filters and containers could be recycled with only up to 46% recycling or returning them. That the BCUOMA study in 2016 found that 78% of British Columbians were aware of the program is interesting and shows the need for more regular and impartial surveys. If only 78% of the BC residents (2016 study) were aware of the program, it can be assumed that the collection rate is lower than that for consumers. The goal should be to get 95% of the population aware of the program by 2024 (and later 100%) with work done to increase awareness of the new range of products. To do otherwise is to continue to externalize costs to the public and the environment.	<b>1</b>  <i>District of Squamish</i>	<b>1</b>  <i>Zero Waste BC</i>	Most British Columbians take their vehicles to be serviced at a licensed mechanic or lube shop and are therefore recycling BCUOMA program materials without realizing it. We feel this is why our awareness levels in the general public have not grown despite increased communications efforts. We would like to focus more on improving awareness among those consumers who change their own oil (RCF Users) but will continue to report on program awareness in both groups.



Comments (by Plan Topic)	Comment Source(s)		BCUOMA Responses / Actions
	# Local Government	# Service Provider/Other	
3. BCUOMA should consider the need to provide information in multiple languages based on the make-up of the communities in BC. Programs may also need to connect with different audiences if there are different kinds of products used by different markets. Consider the 6 demographics of BC with regard to languages and ensure the materials are produced in the suite of languages needed to reach multiple demographics.	1 <i>District of Squamish</i>	1 <i>Zero Waste BC</i>	Thank you for your suggestion. Your comment is noted and will be taken into consideration as part of program delivery.
4. For all products collected, we encourage BCUOMA to encourage producers to include EPR labelling and recycling information on the containers. This would ensure all consumers and businesses are aware of the correct disposal procedure and decrease confusion about what is and is not included in the BCUOMA program. Putting the BCUOMA logo on accepted products packaging will also make it easier for depots to easily determine what is and what is not accepted in the program and help reduce the amount of non-accepted product in the program. BCUOMA should also encourage producers to create labels that will not be destroyed or ruined in the use of the product to reduce orphaned containers that are not accepted in the program.	1 <i>District of Squamish</i>	1 (similar) <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
5. The volume of residential collection of oil is low in comparison to commercial volumes. In terms of marketing and consumer awareness it would be beneficial to see more advertising in the interior of the province. Having more education at the retail locations would be beneficial.	1 <i>Columbia Shuswap Regional District</i>		Over the past two years BCUOMA has increased its advertising efforts in the Interior and has seen the awareness numbers in those areas increase as a result.
<b>Performance Measures &amp; Targets</b> Comments below are from 2 unique Local Governments, 1 unique Service Provider/Other			
1. Section 10 Performance Measures and Targets - These performance measures, targets and reporting commitments should be included in the plan so that a permanent written record can be established.		1 <i>Zero Waste BC</i>	The 3 supplementary documents are in fact a part of the proposed Plan for the upcoming 5-year term. The purpose of having them as separate documents is that their content will undoubtedly change from one term to the next, while the content of the final base Plan is expected to remain static (barring any

Comments (by Plan Topic)	Comment Source(s)		BCUOMA Responses / Actions
	# Local Government	# Service Provider/Other	
			significant program changes). This responds to the new 'evergreen plan' approach requested by the Ministry.
<b>2. Accessibility</b> - The target for accessibility should be for 100% of residents living in a municipality (or First Nation community that wishes it) to have access to a collection facility in their community (with more facilities for those living in cities). Collection events should be counted under marketing, not accessibility.	<b>1</b> <i>District of Squamish</i>	<b>1</b> <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
<b>3. Sales, Collection and Capture Rates</b> - The criteria for what counts as available for collection should be defined by the Ministry and audited and monitored by a third party. Under capture rate, those numbers should be the baseline and the target should be 100% (especially as the plan notes incentives will be adjusted to reach the target so care must be taken to avoid reductions in incentive levels if a target were set too low). Ideally reporting is also given by community (and not just Regional District).	<b>1</b> <i>District of Squamish</i>	<b>1</b> <i>Zero Waste BC</i>	Thank you for your suggestion. Your comment is noted and will be provided to the Ministry as part of this plan document.
<b>4. Consumer Awareness &amp; Education</b> - The targets should be 95% increasing to 100% for knowing what to do with these materials. It is not necessary to know the name of the program but rather that a program or system exists to responsibly handle the materials. Consumers should know where to find the information, but this may vary - for example a local government may have a very strong communications program, or a business may advertise this, and this information should help to inform BCUOMA about what works and where gaps exist, but this section does not show what would qualify as a correct answer.	<b>1</b> <i>District of Squamish</i>	<b>1</b> <i>Zero Waste BC</i>	Most British Columbians take their vehicle to be serviced and are therefore participating in the program without even realizing it. Our focus is on ensuring that people who change their own oil, antifreeze or filters know what to do with the product and responsibly recycle it.
<b>5. Product Management</b> - The definitions and corrections for the levels of the hierarchy should be made and the BCUOMA definitions should not be used.	<b>1</b> <i>District of Squamish</i>	<b>1</b> <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.

Comments (by Plan Topic)	Comment Source(s)		BCUOMA Responses / Actions
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6. Audits - More information should be audited where possible.	<b>1</b> <i>District of Squamish</i>	<b>1</b> <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
7. The table of the Community types should have a column showing what percentage of the BC population each segment is and where the remainder of the 2016 census population of 4,648,055 falls.		<b>1</b> <i>Zero Waste BC</i>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
8. I was wondering about the comment that RCF hours of operation are being added?	<b>1</b> <i>Cariboo Regional District</i>		The Ministry asked BCUOMA to include the information with its annual reporting. It is already included on the BCUOMA website (hours of operation and products accepted), but the Ministry asked that it also be reported on formally.

## Other Comments

Decisions that would fall under the Ministry's authority (1 comment from 1 Local Government; 7 comments from 2 Service Providers)

- Increased transparency and understanding of the BCUOMA program would be achieved through a Ministry determined format for EPR plans and reports, with strict oversight of terms and evidence. *(Nanaimo Recycling Exchange)*
- The BCUOMA EPR Plan DRAFT highlights the need for updated Ministry definitions of all levels of the Pollution Prevention Hierarchy. "Enhanced" Pollution Prevention Hierarchy definitions is an understatement: there should be no entitlement for individual EPR plans or reports to use enhanced definitions. *(Nanaimo Recycling Exchange)*
- The Ministry should also require EPR plans and annual reporting to demonstrate product management in strict terms of the Hierarchy. This would prevent confusing and misleading use of terms. *(Nanaimo Recycling Exchange)*
- The outdated EMA definition of Recyclable Material seems to stand as the criteria for EPR Recycling, Recycled, and Recyclable. By coincidence, or by unfortunate lack of attention to current practices, the EMA definition of Recyclable Material defines the exact requirements of processing for acceptance at

cement kiln markets. It is an environmental disaster that this definition has led to burning material (for revenue) in the making of cement. This market has out-paced value of materials for traditional recycling and has thereby replaced the traditional use of the word Recycling. *(Nanaimo Recycling Exchange)*

- The Ministry should provide clear updated definitions for the Recycling Regulations. NRES is promoting the concept of national standard definitions to harmonize, as recommended by CCME EPR programs in Canada, and that would apply to other programs such as the proposed new plastics registry and labelling programs in BC. *(Nanaimo Recycling Exchange)*
- The Ministry should define Stewardship to prevent latitude for application of the term as demonstrated by the BCUOMA hybrid program. It is not clear how BCUOMA claims stewardship over a product when 96% of the product is not actually being stewarded. *(Nanaimo Recycling Exchange)*
- We are pleased that the program covers all products defined in the Recycling Regulation but hope for completeness that the program would also handle empty oil containers over 30L as well as other forms of lubricating oil. Given that the last consultation in February 2022 was for containers to 210L, this is confusing. *(Zero Waste BC)*
- We would like to see BCUOMA handle empty oil containers over 30L as well as other forms of lubricating oil. *(District of Squamish)*

#### Recommendations requiring collaboration with other agencies *(4 comments from 2 Local Governments; 1 comment from 1 Service Provider)*

- We would like to see BUCOMA and other similar EPR programs work together to produce communications materials that are multi-EPR. If the customers or users are anticipated to be the same, then we would like to see a more harmonized communication program. It is difficult for local governments to promote the multitude of different programs individually, especially with those that have similar products (e.g., HHW & BUCOMA). Labelling and collaboration with other EPR programs would assist in raising the profile of BCUOMA to ensure it is properly capturing all material. *(District of Squamish)*
- More policies are required to improve working relationships between the Stewardship Agencies of BC. Back in 2017 there were summer students who travelled the province promoting all programs in BC. This program has many benefits and needs to be reinstated. More partnerships for education need to be formed between all Stewardship Agencies. A repository of educational resources, social media posts, ads etc. needs to be developed and made available to all collectors, municipalities, and local governments with a common look, feel and messaging. Currently the stewardship agencies work in silos and more collaboration is necessary to advance EPR programs. *(Columbia Shuswap Regional District)*
- The program should also work with other EPR programs that have similar products or products that can be confused between programs, to ensure a resident or business can still easily recycle a product while both EPR programs guarantee that the products will still be recycled responsibly. Product labelling may help to remove this confusion, or there is an allowance for BUCOMA products to be returned through a similar program (ex. Product Care's HHW program), without any penalty to the collection site. *(District of Squamish & Zero Waste BC)*

- In all of the renewal of stewardship agencies plans a commitment to begin to transition to stewardship operated depots needs to be considered. This would not necessarily end the dependence on the collector network, but in communities with a large enough population depot could be set up and collect all EPR items, training would exceed industry standards and BC would be a model for other jurisdictions. *(Columbia Shuswap Regional District)*
- More participation from all the stewardship organizations when it comes to audits would be appreciated. *(Columbia Shuswap Regional District)*

Operational matters for separate consideration *(2 comments from 1 Local Government; 1 comment from 1 Service Provider)*

- Do you plan to streamline RCF claims? *(Cariboo Regional District)*  
*(BCUOMA: We are working on this and have a 1-2 year timeline to achieve this with an e-claim system.)*
- Automatic payments from BCUOMA to the RCF when used oil is collected would be appreciated, if this is in the works but some years off, then payment requests should be accepted by BCUOMA at any time during the year, not only at specific times. *(Cariboo Regional District)*  
*(BCUOMA: We were working on this and have a 1-2 year timeline to achieve this with an e-claim system.)*
- Please provide collectors with a better bung wrench that is made of metal, as the plastic one does not work. Also, a better "full" gauge, again the plastic one doesn't work. (It's a great plan and our experience as a collector has been very positive. Thanks!) *(Pender Island Recycling Society)*  
*(BCUOMA: We will work with any registered collection site and provide bespoke equipment needed to facilitate safe handling of program materials. This request was subsequently resolved with the commentor.)*