



Interchange
Recycling

Stewardship Plan

Yukon

*Lubricating Oil, Antifreeze, Diesel Exhaust Fluid,
Empty Automotive Containers, Oil Filters*

Submitted September 18, 2024

Submitted by:

David Lawes, Chief Executive Officer
Interchange Recycling
536 Broughton Street, 3rd Floor
Victoria, BC V8W 1C6
t. 778-817-0721 | tf. 1-844-722-8662
f. 236-237-1732
<https://interchangerecycling.com>

Submitted to:

Nils Clarke, Minister
Department of Environment
2071 – 2nd Avenue
Whitehorse, Yukon Y1A 1B2

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1. Introduction

Interchange Recycling (Interchange) is submitting this Stewardship Plan (Plan) to serve as a producer responsibility organization (PRO) to deliver a used oil program on behalf of product stewards doing business in Yukon.

The Plan covers a five year term targeted by the Yukon Department of Environment to start on July 1, 2025.

2. Interchange Background

Formed under the British Columbia Society Act in 2003, on behalf of the province's stewards Interchange has operated a British Columbia-wide collection and recycling program for used oil, oil filters and used oil containers since August 2003 and for antifreeze since 2011. This collection program includes the do-it-yourself market as well as the commercial and industrial markets.

Interchange's goal is to provide citizens with an eco-friendly and cost-effective way to manage program materials by keeping them out of the environment and managing them at end-of-life. Each year, approximately 50 million litres of oil and antifreeze are collected and responsibly managed through Interchange's British Columbia program. As a recognized leader of innovation in the area of environmental stewardship, Interchange is well positioned to continue its successful program delivery in Yukon.

3. Interchange Governance

A multi-sector [Board of Directors](#) manages Interchange, with representatives from the manufacturing, retail, local government and public sectors. The Chief Executive Officer reports to the Board and is responsible for operations management, financial management, communications, staff management and general administrative oversight.

Interchange holds an Annual General Meeting (AGM) that is open to the public to attend. As part of the AGM, an Annual Report for each jurisdiction with an Interchange program is released to the steward members and the public. Each report outlines the financial and operational performance over the last year and includes, based on the requirements of the jurisdiction, an Audited Financial Statement and an Independent Non-financial Information Review Report (Audit Report). The Annual Report is submitted to the jurisdiction's designated governing body for review against the regulatory requirements and the approved stewardship plan.

For purposes of the Yukon program management, in June 2024, Interchange established a subsidiary incorporated under the *Canada Not-for-profit Corporations Act*. A multi-sector [Advisory Committee](#) with a majority of Yukon-based members will be established to provide input to the Interchange

Board on significant program changes or developments. The bylaws applicable to the Yukon program are available [here](#).

4. Materials Covered – Regulation section 13(2)(a); Schedule 1, sections 3,4,5,6

On January 25, 2024, Yukon approved its [Extended Producer Responsibility \(EPR\) Regulation](#), which requires the stewards of the following materials to develop a stewardship plan and implement a program by July 1, 2025:

- Lubricating Oil
- Antifreeze
- Diesel Exhaust Fluid (DEF)
- Empty Automotive Containers up to 55 litres*
- Oil Filters

Interchange's proposed Plan to the Government of Yukon covers these regulated categories of materials, as further described in Regulation Schedule 1.

* In addition to Lubricating Oil, Antifreeze and DEF containers, the Interchange program will include empty automotive containers (HDPE, metal, non-HDPE, multi-layer plastics, aerosols) regulated under Schedule 1 that contained products intended for the uses below.

- Windshield washer fluid
- Brake fluid
- Lubricants
- Stabilizers
- Sealers
- Conditioners
- Boosters
- Solvents
- Degreasers
- Fuel system cleaners

Excluded: Products used to clean or maintain the interior or exterior surfaces of an automobile (e.g., car wax and upholstery shampoo)

In August 2024, Interchange received confirmation from the Packaging and Paper Products (PPP) PRO that products listed in the Interchange Plan will be excluded from their Yukon PPP Stewardship Plan.

5. Stakeholder Engagement and Ongoing Input – Regulation 13(2)(b), 13(2)(c), 13(2)(d)(i) and (ii)

Stakeholder Engagement – Stewardship Plan

On March 8, 2024, Interchange held preliminary in-person meetings in Yukon with the following three stakeholder groups:

- Producers
- Local governments
- Waste service providers

On May 7, 2024, Interchange opened the public consultation on its [Proposed Yukon Stewardship Plan](#) and accompanying presentation, [Proposed Stewardship Plan Overview & Highlights](#). Both documents were published on the [Interchange Yukon](#) website together with instructions on providing feedback and information on the virtual consultation sessions.

Open until July 31, 2024, the consultation period included the following five opportunities for stakeholder input:

- Webinar 1: May 28, 2024 (10 AM YST – Yukon)
- Webinar 2: June 17, 2024 (10 AM YST – Yukon)
- Webinar 3: July 18, 2024 (10 AM YST – Yukon)
- Online stakeholder survey: May 7 to July 31, 2024
- Written submissions: May 7 to July 31, 2024

On May 7, 2024, to ensure stakeholder awareness of the consultation including the related webinars, Interchange reached out directly to a comprehensive list of contacts representing Yukon municipal governments, First Nations, service providers, business associations, political parties and potential Yukon stewards. Direct follow-ups were sent to the same contacts again in early July.

Participants in each of the five consultation streams, along with their feedback and Interchange's responses, are included in the [Appendix](#) to this Plan.

Ongoing Input

With respect to gathering input as part of its ongoing operations, Interchange will engage with or be accessible to its program stakeholders in a variety of ways.

- Provide the opportunity for Yukon's stewards, consumers and other stakeholders to bring forward questions or concerns to Interchange at any time by direct telephone (including a toll-free option) or email based on contact information published on the [Interchange Yukon website](#).
- Hold regular Advisory Committee meetings.

- Annually survey the Yukon public for feedback on awareness of Interchange's program.
- Hold regular meetings with key Yukon service providers, including collectors (haulers/transporters) and processors, to assist in keeping current on any challenges to program operations.
- Hold regular meetings with other PROs and governments that manage regulated products to coordinate efficient program operations.
- Deliver regular communication to Interchange's steward members to provide key updates.
- As needed, issue targeted stakeholder consultations/surveys on specific program matters.
- Support dialogue between Interchange's steward members and the director who represents the member on Interchange's Board, allowing any member concerns to be conveyed to the Board and staff.
- Participate in the National Used Oil Material and Antifreeze Advisory Council (NUOMAAC) to examine broader stakeholder perspectives.
- Monitor for scheduled Yukon conferences or other events and attend those where Interchange's participation would benefit the program.

Advisory Committee

Interchange will establish an Advisory Committee made up of the broad spectrum of sectors expected to participate in or be affected by the Yukon program. With 5 to 7 members, the majority of committee members will be Yukon-based, with membership drawn from the following stakeholder groups:

- Local Government
- First Nations
- Non-government organizations (NGO)
- Stewards
- Waste service providers
- Local businesses (e.g., Chamber of Commerce, automotive service stations, auto retailers)

Subject to submission and approval of their Yukon Stewardship Plans, Interchange has agreed with other Hazardous and Special Product (HSP) PROs to collaborate on Advisory Committee development with common Yukon stakeholders. We will reach out to contacts within the noted stakeholder groups to request nominations for Advisory Committee membership. A mutually agreeable Advisory Committee meeting schedule will also be established, potentially meeting twice per year.

For Interchange, the committee's primary role will be to provide input to the Board on any significant program, process or policy adjustments prior to implementing change, and to offer feedback on information received about program developments or activities.

6. Key Performance Indicators and their Measurement – Regulation 13(2)(e)(f)

Material Available for Collection

Interchange seeks to identify and use the best available information, gathered from its steward members and by qualified external consultants, to estimate the amount of each type of regulated material available to collect. Interchange often partners with other used oil associations in Canada to ensure there is consistency at a national level.

- **Lubricating Oil**

- A portion of the lubricating oil supplied into Yukon is consumed in use and not available for collection. Interchange uses “Consumed in Use” studies as an input to inform/update its formula to estimate the volume of oil available for collection. Automotive uses are an example where there is a significant consumed in use factor. Oil that is consumed is typically burned off during vehicle operation, lost in small leaks or drips, or lost in a vehicle accident or engine malfunction.
- Another factor impacting the used oil available for collection in Yukon is re-purposing by the owners. Interchange studies identify that volumes of used oil are directed by owners of the material to purposes such as shop heaters, burner fuel, cement/lime manufacturing and fish/pleasure boats. “Unaccounted Used Oil” studies are also completed periodically to update the available for collection estimates, with the next one planned for 2024/2025.
- Landfill audits performed by local governments help identify if any used oil is being disposed of improperly.

- **Antifreeze**

- Antifreeze is sold in both concentrated and diluted form. Interchange tracks the quantities of each form sold to calculate the volume available for collection.
- Although fewer reports and studies are available for user stage analysis of antifreeze than for oil, the product can be lost in use through leaks, vehicle accidents, engine malfunctions (e.g., hose breaks) and some re-purposing for other uses that are not part of the Interchange program. It can be assumed that most, if not all, of the antifreeze sold off the retail shelf is “top-up” antifreeze that is replacing antifreeze lost in use and not available for collection.
- Interchange has engaged with other provincial programs to study the estimated “Unrecoverable Antifreeze” and also conducts its own studies. Interchange is committed to continuing to conduct these usage studies to further refine consumed in use estimates and obtain information on the purposes and quantities of used antifreeze that are re-purposed or

improperly disposed, with the goal of increasing capture rates. A further and more in-depth investigation will be completed in the next study, planned for 2024/2025.

- Landfill audits performed by local governments help identify if any antifreeze is being disposed of improperly.
- **Diesel Exhaust Fluid**
 - As DEF is designed to be consumed in use, there is no expectation of recoverable product. Other used oil programs in Canada only collect the DEF containers, not fluid, and there is no data presently available on collection of this product.
- **Oil Filters**
 - It is assumed that all oil filters sold into the marketplace are available for collection. Small quantities of used filters may be lost as damaged in use or lost in vehicle accidents, but an approximation of these quantities is not currently deducted from Interchange’s estimates of oil filters available for collection.
- **Empty Automotive Containers**
 - It is assumed that all automotive containers sold into the marketplace are available for collection. Interchange’s varying fee approach will reflect the complexity and cost to manage each product type. As containers need to be substantially emptied before they can be recycled, any partially filled containers will be strongly discouraged through Interchange’s education and awareness program as they will require special handling.

Material Collection Targets

As input to the Yukon Plan development, Interchange sought information on the historical material volumes “available for collection”. Past studies and industry data on estimated used oil generation vary widely, ranging from under 400K to over 800K litres per year, and are in significant contrast to Interchange’s understanding of what is being collected today. Also of note, a 2020 Yukon [EP&A publication](#) estimates that more than 60% of the waste oil generated in Yukon is disposed of through burning in an approved furnace.

As greater clarity around the available volumes (existing sales) and current collection performance by material type is needed to inform target setting, Interchange commits to establishing robust baseline rates through data collection and reporting that will occur during Plan years 1 to 3. Targets for years 4 and 5 will be developed based on the past 3 years’ recovery data, with a goal of year over year performance improvement. The data collected and performance against targets will be reported in the applicable Annual Reports.

Following is Interchange’s proposed methodology for determining material capture rates.

(Reporting Year)					
Material	Qty Reported as Sold (example)	Minus Consumed in Use (%)	Minus Re-purposed (%)	Qty Available for Collection	Capture Target (% of Qty Available)
Lubricating Oil (Litres)	100	No available data ¹	No available data ²	TBD	TBD
Antifreeze (Litres)	100	No available data ¹	No available data ²	TBD	TBD
DEF (Litres)	100	100%	0%	0	Awareness ³
Oil Filters (Units) ⁴	100	-	-	100	TBD
Automotive Containers (Kg) ⁵	100	-	-	100	TBD

1. This will be the average percentage of used oil and antifreeze that is consumed through normal usage across their major categories of use. Interchange commits to regularly conducting studies and identifying other relevant studies in comparable jurisdictions, to support the consumed in use percentages applied. Interchange has conducted similar studies for BC, examples of which are included on the [Interchange website](#).
2. This will be the estimated percentage of used oil and antifreeze directed to uses outside of the program. Note that for used oil, while a percentage will be shown, a recent BC study suggests that used oil re-purposed is more accurately estimated to be a constant quantity than a fixed percentage of the quantity sold. As with consumed in use, Interchange commits to regularly conducting or identifying relevant studies to support the re-purposed percentages applied.
3. For DEF, as no residual product should remain, a meaningful collection target cannot be defined. Instead, Interchange will focus on educating the public on what to do with any residual material (e.g., use it up, or donate it to other users of this product).
4. The weight of filters collected is converted to units collected based on a conversion factor calculated in the latest filter conversion study. Filter studies are conducted regularly and included on the [Interchange website](#).
5. Interchange intends to report on the recovered weight for all regulated containers as one weight rather than by individual product type (e.g., oil, antifreeze, DEF).

7. Material Management (Categories) – Regulation 13(2)(e)(g)

For the purposes of Interchange’s recordkeeping and reporting to the Minister, the categorization of materials will be as presented in the [table in section 6](#) above.

8. Detailed Implementation Plan – Regulation 13(2)(h), 13(2)(i)

Measures and Timelines

Below is a timeline setting out key measures to be taken by Interchange leading up to the July 1, 2025 program start date*.

2024 / 2025															
Activity	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
Publish draft Plan on Interchange website / open steward & stakeholder consultations	7th														
Conduct stakeholder webinars	28th	17th	18th												
Close consultations			31st												
Compile “What We Heard” (Appendix to Final Plan)															
Do follow-up research / refine draft Plan															
Submit proposed Plan to Minister					25th										
Provide Plan clarifications to Minister															
Receive Plan approval from Minister								31st							
Engage processors / recyclers															
Establish SWMF locations															
Engage collectors (haulers/ transporters)															
Establish Advisory Committee															
Engage with local & FN gov. on future service preferences															
Ramp-up awareness campaign															
Update Interchange Yukon website															
Launch Yukon program*															1st

* Program start date will be the later of July 1, 2025 or 6 months after the Plan approval date.

Engaging Local and First Nations Government in Program

Interchange will reach out to local governments and First Nation communities to determine if they provide for the collection of Interchange program materials, if they wish to develop a system, if they wish to continue, or if alternate collection options need to be developed.

For those that want to start or continue facilitating collection, Interchange will request that they register their facilities with the program. All local governments and First Nation communities will have opportunities to engage with or receive support from Interchange as outlined in section 5, [Ongoing Input](#), whether or not they become registered participants.

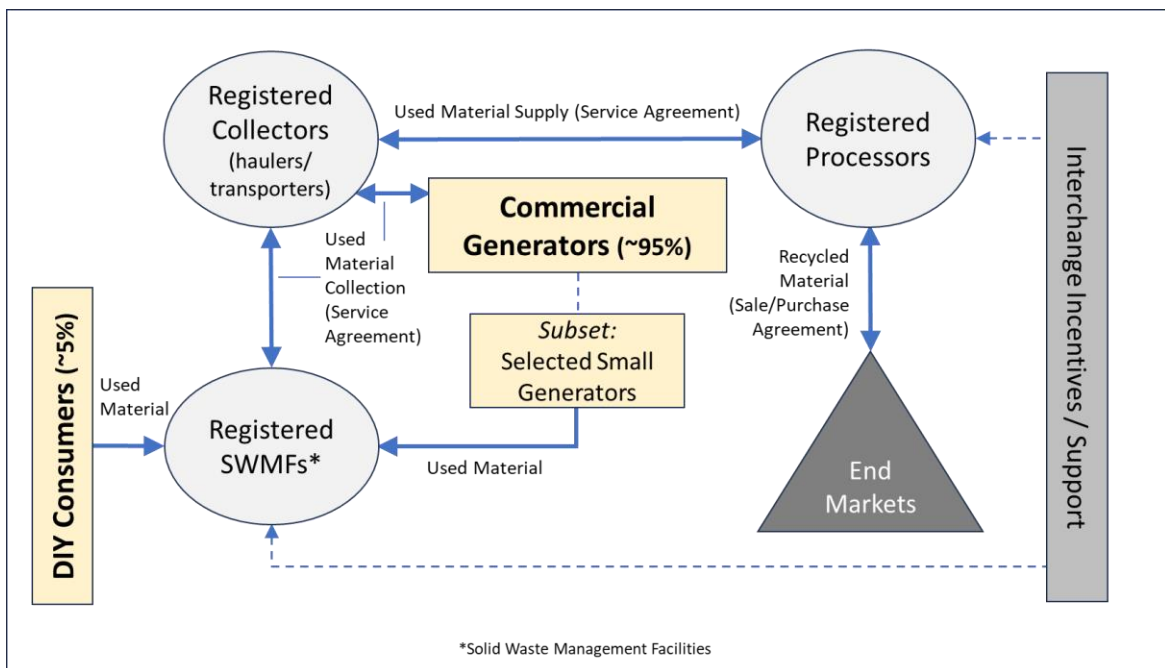
9. Free and Reasonable Collection (Packaging and Paper Product)

Not applicable.

10. Free and Reasonable Collection (Hazardous Products) – Regulation 13(2)(k)

In accordance with the Regulation, the Interchange program will provide do-it yourself consumers and small commercial generators free and reasonable access to its collection services.

The diagram below depicts the overall Interchange system and is followed by descriptions of the system components. (Interchange’s incentive program, also depicted in the diagram, is detailed in [section 12](#), Fair Compensation.)



Collection Facilities / Collection Service Descriptions

Interchange will ensure that special wastes collected under the program are managed in accordance with Yukon’s [Special Waste Regulations](#). Collection facilities will receive training on the proper

handling of the end-of-life materials including monitoring for and segregating products where contaminants have been identified.

- **Do-it-yourself Consumers and Small Commercial Operators (~5% of collected materials)**

Consumers who change their own oil or antifreeze generally represent a small percentage of the material collected. To serve these users, Interchange will work with all stakeholders to better understand the existing system while maintaining equivalent service levels and develop plans to improve the system with a focus on better environmental outcomes for the products being managed. For example, in BC Interchange has developed Return Collection Facilities (RCFs) that use modified sea containers with spill containment, collection tanks and consumer friendly signage, and provided standardized training for facility operators. In recent years, these containers have been a successful improvement to the BC program.

Wherever possible, Interchange will continue to work with existing Yukon solid waste management facilities (SWMFs) that accept a variety of stewardship program products, such as privately operated multi-material depots (bottle depots), local government operated recycling and landfill sites, eco depots, and retail and industrial sites. The Interchange Yukon website will include a search tool for consumers to locate their nearest drop-off facility.

In addition, there are mechanic shops and “quick lube” shops in Yukon located to coincide with demand. Many consumers take their vehicles to these businesses to have their oil, oil filter and antifreeze changed. The materials at these shops will be picked up by a program-registered collector on a frequent basis.

- Household Hazardous Waste (HHW) Day Events

Through its grant program, Interchange will also support HHW Day events initiated and run by Yukon’s local governments and use these events to help increase program awareness with residents. Ideally, these events will be organized as multi-material events that are also supported by other stewardship programs to provide residents with an opportunity to recycle multiple products at the same event.

Interchange’s support will be in the form of a fixed payment per event that takes into account the costs involved, as well as educational materials and signage.

- **Commercial Collection (~95% of collected materials)**

Generators of used oil and antifreeze materials, in quantities more than a do-it-yourself consumer, will make collection arrangements directly with one of the program’s registered collectors. All collectors are government-approved carriers.

Commercial operations include service stations, lube shops and large commercial operations (e.g., mining, forestry and agriculture).

The commercial collection system provides the cleanest material and leads to the best environmental outcome for that material. In a commercial setting, oil and antifreeze recovered from a personal or commercial vehicle can be stored and kept clean and free of contaminants, such as water, gasoline and solids. Oil and antifreeze that is kept free of contamination is more likely to be processed and re-refined as new lubricating oil or antifreeze.

- **Other**

Interchange will work with other PROs to ensure collection and management of containers discarded by consumers at residential premises into the curbside system. However, the preference will be that consumers are directed to bring the containers to a SWMF or HHW Day event as containers discarded in curbside systems may cause contamination and other environmental issues.

Communities/Areas Served by Facilities

Factors such as remoteness, low population, low generation volumes, long distances between communities and end markets, and increased labor costs all have an impact on the cost of collection and management of Yukon’s HSPs. To manage a cost-effective program, all stakeholders will need to work collaboratively to develop a well serviced collection system that provides reasonable access for generators.

Interchange is committed to working with other HSP PROs and the Yukon government to deliver a program that provides for the same service levels and serviced communities detailed in the report Recycling in the Yukon 2022 <https://yukon.ca/en/recycling-yukon-2022> (see table below).

Over the course of this Plan, Interchange will also work with the Yukon government, local governments, First Nations, Chambers of Commerce, businesses, generators and other PROs to better define what reasonable and free access to collection facilities or collection services means. The aim will be to improve environmental outcomes and increase accessibility and service levels over the lifespan of the Plan, while still operating a cost-effective program.

Yukon Community Depots (“Y”) and HHW* Day events 2022		
1	Whitehorse	Y [**]
2	Beaver Creek	Y
3	Braeburn	-
4	Carcross	Y
5	Carmacks	HHW Day
6	Champagne	Y
7	Deep Creek	Y
8	Dawson	HHW Day
9	Destruction Bay	Y

Yukon Community Depots (“Y”) and HHW* Day events 2022		
10	Faro	HHW Day
11	Johnson’s Crossing	-
12	Keno (Closed in 2022)	-
13	Haines Junction	HHW Day
14	Marsh Lake	Y
15	Mayo	HHW Day
16	Mount Lorne	Y
17	Old Crow	Y
18	Pelly Crossing	Y
19	Ross River	Y
20	Silver City	-
21	Stewart Crossing	-
22	Tagish	Y
23	Teslin	Y {***}
24	Watson Lake	HHW Day

Notes

* HHW – household hazardous waste

** Whitehorse has been updated from the 2022 report as it now has a depot (previously held HHWs Days only)

*** In Teslin, HHW is collected at the Municipal Yard, rather than at the solid waste disposal facility

Level of Access to Facilities

As part of the depot search tool on the [Interchange Yukon website](#), Interchange will provide the location and operation hours of the facilities that accept program materials. Once established, a calendar of scheduled HHW Day events will also be published.

11. Cost Recovery – Regulation 13(2)(l)

The Yukon program will be funded by Interchange’s steward members through an Environmental Handling Charge (EHC) on the sale or commercial use of new materials. The fee amounts are cost-driven, and each member will determine if and how it will recover the Interchange charges.

The EHC rates applicable to Yukon stewards, by material type, will be published on the [Interchange Yukon website](#).

12. Fair Compensation – Regulation 13(2)(m)

Interchange will pay the cost of product collection and management by providing incentives to the marketplace to drive desired outcomes. Registered participants will own/have the ability to market the material and control their financial outcomes.

The four cost/revenue components included in Interchange’s compensation methodology are described below. Also shown are the cost elements specifically considered and the financial incentives provided to ensure that program accessibility and recovery objectives are met.

Cost/ Revenue Component	Cost/ Revenue Elements Considered	Incentives Provided by Interchange for	
		Commercial Collection	SWMF Consumer Collection
Generator Site Costs	Labour Space Equipment Materials Other	No incentive provided by Interchange—these costs are considered to be a cost of business for all commercial operators who derive used oil materials as a by-product of their normal business operations	A SWMF incentive is provided by Interchange directly to the SWMF operator to offset site operating costs in return for receiving used oil materials at no cost to consumers Infrastructure grants are available to SWMF operators to support improved facility standards for SWMF operators and collectors, and to allow SWMFs to store materials safely and in economic quantities
Market Value of Collected Materials	Positive or negative market value of the collected materials	No incentive provided by Interchange—these costs are considered to be a cost/revenue source for all commercial business operators who derive used oil materials as a by-product of their normal business operations	SWMF operators may benefit from revenue opportunities, where negotiated with collectors and/or processors
Transport and Management	Fuel Labour Insurance Equipment Overhead costs Market price (cost) Other	A Return Incentive based on material type is paid to registered collectors and processors to offset the costs of transporting and managing materials from the generation point to the processing facility	A Return Incentive based on material type is paid to registered collectors and processors to offset the costs of transporting and managing materials from the generation point to the processing facility

Cost/ Revenue Component	Cost/ Revenue Elements Considered	Incentives Provided by Interchange for	
		Commercial Collection	SWMF Consumer Collection
Processing Costs / Revenue	Processing costs	Return Incentives paid to registered processors, when considered with the net revenues and/or costs of processing these materials, cover the costs of processing materials to Interchange approved processing standards	SWMF operators may benefit from revenue opportunities, where negotiated with collectors and/or processors

Incentive rates are reviewed on a regular basis with adjustments made accordingly.

Interchange will work with Yukon’s commercial generators and registered collectors (haulers/transporters) and processors to ensure the factors that dictate the cost of service are well understood by all parties so that efficient and timely collection is provided by all registered collectors, and that processors receive high quality materials. Setting of standards for quality, contamination, minimum volumes and methods and the location of stored materials will ensure that commercial operators can better manage their commercial agreements with collectors and processors.

13. Collaboration to Improve Efficiency and Effectiveness – Regulation 13(2)(n)

Interchange will work collaboratively and in conjunction with (where feasible) other PROs, local governments and local programs/facilities to maintain a coordinated and cost-effective approach to collection and transportation of program materials in Yukon. Of note, Interchange has agreed with the other pending HSP programs to collaborate on utilizing the same carriers whenever possible and, as noted earlier, to develop an [Advisory Committee](#) with common Yukon stakeholders.

To create efficiencies and consistencies across programs, Interchange already has collaborative relationships with organizations that include the other Canadian used oil management associations and stewardship programs that manage other materials.

Where collaboration involves multiple Yukon PROs, Interchange will work with them to ensure stewards only report any related data into one program.

14. Public Awareness – Regulation 13(2)(o)

To ensure compliance with the Regulation's requirements for raising public awareness, Interchange will implement a comprehensive strategy tailored to effectively communicate key information to the community. Firstly, Interchange will develop clear and accessible materials outlining the program's objectives, designated materials accepted for collection, and the importance of proper end-of-life handling. These materials will be disseminated through various channels, including the [Interchange Yukon website](#), informational brochures, and educational campaigns.

Secondly, Interchange will ensure that information regarding the location of collection facilities and how collection services can be accessed is readily available to the public. This will include maintaining an updated directory of collection sites on the website, collaborating with local municipalities to include this information in recycling guides or calendars, and utilizing signage at collection points for easy identification.

Thirdly, Interchange is committed to fostering open communication with the community by providing clear channels for inquiries and concerns via email or phone. Individuals can submit questions or raise any issues related to the program to Interchange staff. Prompt responses and transparent communication will be prioritized to address inquiries effectively and maintain public trust.

Lastly, Interchange will actively promote awareness of the proper end-of-life handling of designated materials collected and recovered. Through educational initiatives, social media campaigns, and collaboration with community organizations, Interchange will emphasize the importance of responsible disposal practices and provide guidance on recycling options for various materials. By engaging the public in these efforts, Interchange aims to foster a culture of environmental stewardship and ensure compliance with regulatory requirements while promoting sustainable behaviors within the community. Information provided will also include how the materials will be managed at end-of-life.

15. End-of-Life Material Management – Regulation 13(2)(p), 13(2)(q)

Interchange is aware that significant but unconfirmed volumes of some materials covered under this Plan (see [section 4](#)) are being repurposed by the owners for uses such as shop heaters and fuel. For this reason, Interchange commits to gaining a deeper understanding of Yukon's existing End-of-Life Material Management in order to make informed projections for improvements in environmental outcomes that align with the Yukon waste hierarchy.

Reporting on the end fates of all program materials will be provided in Interchange's Annual Reports and on the Interchange Yukon website. End fates reported have been verified through desk reviews as part of Interchange's Return Incentive claim process and are subject to audit. The reporting categories for End-of-Life Materials are identified in the table in [section 6](#).

Reduction of Adverse Environmental Impacts

Interchange's commitment to pursuing collaborations for material collection and transportation will result in reduced carbon and ecological footprints to manage Yukon's hazardous waste. Additionally, Interchange's emphasis on delivering a robust consumer awareness and education program will increase knowledge of the proper disposal methods and improve material collection and recycling performance. Also noteworthy, the Department of Environment will receive improved, ongoing reporting on the management of program materials.

16. Dispute Resolution – Regulation 13(2)(r)

Interchange is committed to understanding and addressing any matters as they are initially raised by stakeholders. Should issues or concerns be identified, the individual or organization can take the following steps:

1. Interchange provides multiple communication channels to mitigate the need for issue escalation. As detailed under [Ongoing Input](#), Interchange offers clear pathways to raise matters of concern early on, including by consumers, the general public, stewards and service providers*. Should there be a matter that cannot be resolved collaboratively through the normal channels, the individual or organization can proceed through the next steps.
2. Bring the dispute to the Chief Executive Officer.
3. Bring the dispute to the Advisory Committee.
4. If the matter is not resolved at the previous levels, service providers can use normal commercial legal procedures such as Yukon's [Arbitration Act](#).

*With respect to potential service provider matters, of note is that Interchange's incentive system supports the competitive commercial market.

17. Other Requirements – Regulation 13(2)(s)

Currently not applicable.

18. Annual Report and Records Submission – Regulation 17(1) to (6), Regulation 20(1)

Annual Report

On or before July 1st of each year, Interchange will submit an Annual Report to the Minister and publish it publicly on the [Interchange Yukon website](#). The report will include:

- a description of the program’s collection facilities, collection services and collection events, including the number and location of facilities and the level of access to each facility and service;
- the total weight of designated materials, categorized by type, supplied to end users in Yukon for which the stewards participating in the program are responsible;
- the total weight of designated materials, categorized by type, available for collection (including an explanation of the factors applied);
- the targeted collection rate for each type of designated material to be collected and recovered under the program;
- the total weight of designated materials, categorized by type, collected under the program;
- the collection rate for each type of designated material collected and recovered under the program;
- a description of the efforts made to raise public awareness about the program;
- a description of the efforts made to reduce adverse environmental impacts throughout the life cycle of each product category of designated material collected and recovered under the program; and
- beginning with the second Annual Report, a description of how the collected designated materials were managed in accordance with the waste management hierarchy, including the total weight of materials managed at each level of the waste management hierarchy.

Audited Financial Statements

Every three years, beginning with the second Annual Report submitted, Interchange will include in the Annual Report independently audited financial statements detailing:

- all deposits (EHCs) received from, and refunds paid to stewards participating in the program;
- the revenues and expenditures in relation to any fees associated with the program that are charged at the point-of-sale to an end user by stewards participating in the program and identified on the sales invoice provided to the end user;
- the total amount spent to operate the program;
- the costs incurred to administer the program; and
- the amount spent on public education or public awareness and communication.

Audit Report (Independent Non-financial Information Review Report)

Every three years, beginning with the second Annual Report, Interchange will submit an audit report to the Minister on or before September 1st for the purpose of verifying key metrics included in the Annual Report that was most recently submitted in respect of the program.

Records Submission

For a minimum of five years, Interchange will maintain the records as detailed in Regulation Section 20.

Appendix – Consultation Results

1. Introduction

The table in Appendix [section 2](#) summarizes stakeholder input on the [Proposed Yukon Stewardship Plan](#) received through all consultation streams together with Interchange’s responses, where applicable. Appendix [section 3](#) identifies all consultation participants by stream.

In the table, some lengthy written comments received may have been condensed and some similarly themed comments may have been consolidated, without the intent of distorting the original messaging. For transparency, the full text of both the survey responses ([section 4](#)) and written submissions ([section 5](#)) is included in this Appendix. Note that webinar comments or questions included in the table are based on notes taken by Interchange.

Themes in comments across all consultation streams include:

- Concerns about the additional containers becoming “free-riders” in the program.
- Challenges that Interchange’s commitment to a 10% year-over-year improvement in capture targets is premature.
- Inquiries regarding Interchange’s openness to maintaining/potentially increasing current service levels rather than targeting the 2022 community service levels.
- Inquiries on whether a facility could charge a fee to consumers (or back to Interchange) if program compensation does not cover the full costs.

Of note, with 7 survey responses received, all respondents either supported the [Proposed Plan](#) as written or with some content clarifications. The results were as follows:

Support plan as written

Wakefield Canada, Inc.

Town of Watson Lake

Support plan with clarifications

Village of Haines Junction (responses from 2 representatives)

Ford Motor Company of Canada, Limited

General Motors of Canada

FCA Canada Inc.

Do not support plan

None

2. Consolidation of Input Received

Input (by Stewardship Plan Section)	Input Source(s)		Interchange Responses/Actions
	Local Gov./First Nation	Existing Service Provider/Generator /Other	
1.- 3. Interchange Background / Governance			
Has the Advisory Committee been formed? Are there details of who they are and what they will do?		<i>Whitehouse Chamber of Commerce (webinar 2)</i>	The committee has not yet been formed. The Proposed Plan discussed how the members will be determined, the committee's purpose, and the timeline for its development.
4. Materials Covered			
The plan indicates that in addition to covered containers the program is directly targeting that it will include other empty containers such as sealers, conditioners, boosters, solvents, WWF, etc. Without understanding the volume of these other containers, it seems premature to indicate they will be included without costing provided. Producers of those other products will not be providing any funding which means they are essentially free riders in this program with expenses paid by the regulated producers. I do not support the automatic inclusion of these materials. A study or analysis needs to be done to determine the amount that could be collected, the cost and if important producers are missing from the obligated parties. This is a significant concern with the proposed plan.		Multiple similar comments: - General Motors of Canada (webinar 1 & survey) - Ford Motor Company of Canada (webinar 1 and survey) - FCA Canada Inc. (survey) - CVMA (written submission)	Interchange will only collect regulated materials. In BC, we encounter many of these other containers coming into our streams and anticipate the same will occur in Yukon. In terms of the related costs, Interchange would be looking for all obligated stewards to participate in the program and remit fees to cover the cost of managing all program materials, as per the Regulation.
As a supplier of products to the mining industry, how does this system affect us?		<i>ALX Exploration Services (webinar 1)</i>	The obligated parties and their responsibilities are determined

Input (by Stewardship Plan Section)	Input Source(s)		Interchange Responses/Actions
	Local Gov./First Nation	Existing Service Provider/Generator /Other	
			by the YG and are defined in the materials posted on its website .
Our contaminated containers currently go to a existing for-profit business at significant expense to us. Will that for-profit company also be receiving incentives now? Or will there be another company, and should we be making other plans?		<i>Whitehorse Motors Ltd.</i> <i>(webinar 1)</i>	Answers to some of these questions are still TBD. We are aware of the existing system and will be working with contractors to better understand their system and the costs involved. We plan to work with the existing system, and make improvements where possible. The YG requires management of these materials, and we will be developing a plan to make sure these materials are managed appropriately.
In light of the Federal government’s plastic registry, are you intending to collect that information and provide it with the diversion information on behalf of your members?		<i>General Motors of Canada</i> <i>(webinar 1)</i>	Interchange publishes an Annual Report that includes the end fates/disposition of the materials collected, however, it will not be broken down by brand owner. Regarding the federal registry, there is still some uncertainty around the expectations of PROs.
Please explain how the collection of additional unobligated containers integrates with the proposed stewardship program for packaging and paper products. Is there a financial transfer between PROs?	<i>City of Whitehorse</i> <i>(written submission)</i>		The Final Plan has been updated to reflect that the stewardship plan aligns with the plans of other PROs to avoid overlap. Interchange has agreements in place with packaging PROs to prevent duplication of fee collection. Interchange will only collect those obligated materials detailed within our Plan.

Input (by Stewardship Plan Section)	Input Source(s)		Interchange Responses/Actions
	Local Gov./First Nation	Existing Service Provider/Generator /Other	
<p>What are the proposed acceptable levels of contamination for the different obligated materials? i.e. acceptable percentage of non-obligated containers, acceptable percentage of contaminants in waste oil, etc.</p> <p>What are the potential penalties to a collection facility for contamination above acceptable thresholds?</p>	<p>City of Whitehorse <i>(written submission)</i></p>		<p>Collection sites will be expected to follow best management practices (BMPs) and the training provided in order to minimize contamination.</p>
5. Stakeholder Engagement / Ongoing Input			
No comments			
6. Key Performance Indicators and their Measurement			
<p>The commitment to 10% year-over-year capture improvement seems premature given that the existing collection performance remains unclear. The focus should be on continuous improvement.</p>		<p>Multiple similar comments:</p> <ul style="list-style-type: none"> - Whitehorse Chamber of Commerce <i>(webinar 2)</i> - Ford Motor Company of Canada <i>(survey)</i> - FCA Canada Inc. <i>(survey)</i> - General Motors of Canada <i>(webinar 1 and survey)</i> - CVMA <i>(written submission)</i> 	<p>The percentage shown in the Proposed Plan was aspirational. It was intended to demonstrate Interchange’s commitment to continuous improvement, recognizing that there is a point of diminishing returns. This goal has been better articulated in the Final Plan.</p>

Input (by Stewardship Plan Section)	Input Source(s)		Interchange Responses/Actions
	Local Gov./First Nation	Existing Service Provider/Generator /Other	
During the two-year data collection period, is material still being processed over that time?		Whitehorse Chamber of Commerce (webinar 2)	Yes. Program materials will be collected and processed for the duration of the Plan.
The draft plan proposes establishing target material capture rates after year 2 of the program. Will there be opportunity for feedback on these proposed targets following year 2?	City of Whitehorse (written submission)		Interchange Annual Reports will be available on our website. We welcome feedback on an ongoing basis.
Since capture rates will not be used, what are the proposed alternative performance metrics to be used in years 1 and 2?	City of Whitehorse (written submission)		Interchange commits to reporting on the actual capture performance each year, with year over year increases in performance.
7. Material Management (Categories)			
No comments			
8. Detailed Implementation Plan			
No comments			
9-10. Free and Reasonable Collection			
You indicated that you will work with local governments to deliver equivalent services as provided in Yukon in 2022 (including Haines Junction's HHW day). We anticipate requiring an increased schedule due to the anticipated increase in drop-offs at the facility as a result of regionalization (e.g. we may need/want to increase the number of HHW days to 2 or 4 x year).	Village of Haines Junction (survey)		Interchange will be working with individual collection sites to determine what is needed in each community.

Input (by Stewardship Plan Section)	Input Source(s)		Interchange Responses/Actions
	Local Gov./First Nation	Existing Service Provider/Generator /Other	
<p>You have also indicated you will work with local governments to better define reasonable and free access to collection facilities/services. Note the Village of Haines Junction is required to develop a tipping fee structure under our regionalization agreement. We need clarification if the intention is that we would pass fees along to Interchange Recycling for what is dropped off at our facility instead of charging whomever is dropping the materials off.</p>	<p><i>Village of Haines Junction (webinar 1 and surveys)</i></p>		<p>Regulation requires free access and drop-off for consumers, so tipping fees should not be applicable in this case. We would look to compensate the collection site for the services they are providing.</p>
<p>Current HHW days do not encompass the need for material removal. While the grant is appreciated by municipalities, some require more material removal than the HHW day provides. As such tipping fees were thought to lift this burden. Under this program with no fees allowed will allowance be made for material removal based on accumulation not just a single day per year?</p>	<p><i>Village of Haines Junction (webinar 1 and surveys)</i></p>		<p>See above.</p>
<p>To clarify our understanding of the draft plan, is Interchange’s intention to work with the existing collection scheme in place at the City’s Solid Waste Management Facility (SWMF) or to expand collections beyond one day per week? What is the targeted level of access to an RCF for DIY Consumers in Whitehorse?</p> <p>To clarify, the number of HHW Days offered in Whitehorse in 2022 was 3; however, as of February 2024 the City</p>	<p><i>City of Whitehorse (webinar 1 and written submission)</i></p>		<p>Interchange will be working with individual collection sites to determine what is needed in each community. If one day per week is sufficient and currently works for a community, then we will leave it at that. It is anticipated that collection sites will determine their own schedule to meet the needs of their community.</p>

Input (by Stewardship Plan Section)	Input Source(s)		Interchange Responses/Actions
	Local Gov./First Nation	Existing Service Provider/Generator /Other	
holds weekly collection days. Is the plan committing to provide for the same service levels as in 2022 or the current service levels?			
If a weekly collection schedule is maintained, in addition to the volume-based incentive, is Interchange proposing to cover all removal/disposal costs or to offer a fixed weekly payment?	<i>City of Whitehorse (written submission)</i>		Yes. Interchange will cover the cost of managing program materials.
Are there alternative options being considered for a return collection facility if the City does not agree to continue as a collection site or offer space for Interchange to operate a collection site?	<i>City of Whitehorse (webinar 1 and written submission)</i>		We will be looking at individual locations and develop a collection system that best meets the requirements of the community.
Please note that if Interchange is proposing to establish a collection facility on City property and the City chooses not to register as a collection facility, this would need to be facilitated through a lease agreement approved by Council.	<i>City of Whitehorse (webinar 1)</i>		Noted, thank you.
If compensation doesn't cover the full cost, is there anything preventing the municipality from implementing some kind of fee, given that the program is meant to be free?	<i>City of Whitehorse (webinar 1)</i>		The program would look to confirm that the facility isn't incurring any costs to accept the materials. The Regulation calls for free and reasonable access for consumers to recycle their materials, which is interpreted as not being charged a fee to drop off program materials. If a facility were to charge fees, we would likely need to explore a different option in that community. Again,

Input (by Stewardship Plan Section)	Input Source(s)		Interchange Responses/Actions
	Local Gov./First Nation	Existing Service Provider/Generator /Other	
			we will be looking at situations on a case-by-case basis.
Do the modified sea containers offered to RCFs remain property of Interchange or is ownership of the container transferred to the RCF?	City of Whitehorse <i>(written submission)</i>		Ownership of sea containers provided through our Infrastructure Grant program become the property of the RCF once terms and conditions of the grant program have been fulfilled.
11. Cost Recovery			
No comments			
12. Fair Compensation			
The presentation indicated that infrastructure grants will be offered to SWMFs to support improved facility standards. We'd like more details on this.	Village of Haines Junction <i>(survey)</i>		A YK infrastructure grant program will be developed along similar lines as the grants offered in BC. Details are provided in the Infrastructure Grant manual and related application form at: https://interchangerecycling.com/participants/return-collection-facilities/infrastructure-grants/
Are SWMF incentive rates determined yet?	City of Whitehorse <i>(webinar 1)</i>		No rates have been established at this time.
Is the incentive expected to be volume-based, same as BC – given the smaller YK volumes? What is the proposed volume-based incentive for operating a Return Collection Facility and how is this calculated? If an incentive does not fully cover associated operating costs for a SWMF,	City of Whitehorse <i>(webinar 1 & written submission)</i>		We do not yet have enough information on volumes and will be determining that in the first year or two of the program.

Input (by Stewardship Plan Section)	Input Source(s)		Interchange Responses/Actions
	Local Gov./First Nation	Existing Service Provider/Generator /Other	
can this be amended based on the facility's actual costs to provide for collection?			
The draft plan notes support for HHW days in in the form of a fixed payment per event and educational materials, as well as a volume based payment to the collector. How is this fixed payment amount determined?	City of Whitehorse <i>(written submission)</i>		The payment will be based on the costs to hold the event, which are yet to be determined.
The table in Section 12 states that "SWMF operators may benefit from revenue opportunities, where negotiated with collectors and/or processors." Please elaborate on these potential revenue opportunities and how likely they are to be realized.	City of Whitehorse <i>(webinar 1 and written submission)</i>		The collector may be providing other services to the community and there could be benefits to them of doing so. It can also depend on the market conditions for the products, i.e. whether they have value at the end of their lives.
13. Collaboration to Improve Efficiency and Effectiveness			
No comments			
14. Public Awareness			
Are there additional financial incentives provided to SWMFs for promotion and education costs? Or is that all handled by Interchange?	City of Whitehorse <i>(webinar 1 and written submission)</i>		There are no incentives for awareness/education – Interchange provides that service. But we are also willing to work with sites on a case-by-case basis when it comes to signage, brochures, outreach, etc.
15. End-of-Life Material Management			
No comments			
16. Dispute Resolution			

Input (by Stewardship Plan Section)	Input Source(s)		Interchange Responses/Actions
	Local Gov./First Nation	Existing Service Provider/Generator /Other	
The proposed dispute resolution process does not seem to recognize that in some instances independent service providers or small local governments may be disadvantaged due to financial and human resource strain imposed by dispute resolution and arbitration. How do you plan on addressing this potential disadvantage to ensure this process is fair to small service providers?	City of Whitehorse <i>(written submission)</i>		Interchange Yukon believes the process included in the Plan provides fair and efficient resolution procedures for disputes, that meet the requirements of the Regulation. We welcome additional suggestions for consideration.
17. Other Requirements			
No comments			
18. Annual Report and Records Submission			
The last bullet under Annual Report states “in the future”. Please provide a less abstract timeframe for describing how materials are managed in accordance with the waste management hierarchy.	City of Whitehorse <i>(written submission)</i>		The Final Plan has been updated to indicate that this reporting will begin with the second Annual Report submitted. This reflects that there would only be approximately one-half year of data available prior to the deadline for submitting the first Annual Report to the Minister.
OTHER - General			
How does the current system compare to the one proposed?		Wakefield Canada, Inc. <i>(webinar 1)</i>	Our approach will be to work with the existing system and see where improvements can be made.
Has Interchange been involved in jurisdictions the same size as YK?		Whitehorse Chamber of Commerce <i>(webinar 2)</i>	Interchange works closely with other jurisdictions in Canada that have similar geographic and demographics as Yukon. We also

Input (by Stewardship Plan Section)	Input Source(s)		Interchange Responses/Actions
	Local Gov./First Nation	Existing Service Provider/Generator /Other	
			work with remote communities in BC and are able to draw and build on our experiences, as well as working with organizations in YK.
Running a program in the far north is new and many elements are unknown. The plan has very little information about how the program will actually work or any information about costs. It's important to continue developing the plan and consulting with producers. New EPR programs are coming online in many provinces and territories and the experience for Producers has been mixed and in many cases frustrating. Information being released too late in the process. No guidance available, IT systems delayed. All of these things impact the overall effectiveness of the desired program and achieving the stated objectives.		<i>General Motors of Canada</i> <i>(survey)</i>	Noted, thank you. As confirmed above, wherever possible, we will work with and draw on the experiences of both Yukon and other Canadian jurisdictions.

3. Consultation Participants

Webinar 1: May 28, 2024 (10 AM YST – Yukon). Participant input is included in the table in Appendix [section 2](#).

Name	Affiliation
Lane Tredger	Yukon NDP Caucus
Amal Ghamrawi	FCA Canada
Tina Woodland	Whitehorse Motors Ltd.
Bing Sun	Honda

Name	Affiliation
Scott Boulton	Ford Motor Company of Canada, Limited
Michelle Falloon	Yukon Environment
Tammy-Renee Giroux	General Motors of Canada
Glen Morrison	Canadian Kawasaki
Michael Dirks	KBL Environmental Ltd
Qiaoyu Lu	CNH Industrial
Ira Webb	City of Whitehorse
Ted Laking	ALX Exploration Services
Sarah Pate	Navistar Canada ULC
Mageswaran Palany	Wakefield Canada, Inc.
Aynslie Ogden	Village of Haines Junction
Jerry Tracet	Village of Haines Junction
D. Fairbank	Unknown

Webinar 2: June 17, 2024 (10 AM YST – Yukon). Participant input is included in the table in Appendix [section 2](#).

Name	Affiliation
Irfaan Hasham	Global Automakers of Canada
Ben van Gogh	ALX
Arielle Boulanger-Houde	Demers Ambulances
Nadine Bernier	Demers Manufacturier d'Ambulances inc.
Matthew Bartolloni	Ford Motor Company of Canada, Ltd.
Alex Niro	Subaru Canada Inc.
Blair Howell	Subaru Canada, Inc.
Michelle Falloon	Yukon Environment
Subrena Vieglais	Yamaha Motor Canada Ltd

Name	Affiliation
Allie Ho	Mercedes-Benz Canada
Natalia Baranova	Yukon Environment
Keara Hlewka	Whitehorse Chamber of Commerce
Yvonne	n/a
Virginia Cobbett	Yukon Government
Ted Laking	ALX Exploration Services
Shaneika Bowra	Mitsubishi Fuso Truck of Canada

Webinar 3: July 16, 2024 (10 AM YST – Yukon). Participant input is included in the table in Appendix [section 2](#).

Name	Affiliation
Cam Lockwood	Town of Watson Lake
Ted Laking	ALX Exploration Services
Michelle Falloon	Yukon Environment
Kathryn Witteman	Suzuki

Online stakeholder survey: May 7 to July 31, 2024. Participant input is included in the table in Appendix [section 2](#). Full survey responses are presented in [section 4](#).

Name	Affiliation
Amal Ghamrawi	FCA Canada Inc.
Aynslie Ogden	Village of Haines Junction (1 of 2)
Cam Lockwood	Town of Watson Lake
Scott Boulton	Ford Motor Company of Canada, Limited
Jerry Tracey	Village of Haines Junction (2 of 2)
Tammy Giroux	GM Canada



Name	Affiliation
Mageswaran Palany	Wakefield Canada, Inc.

Written submissions (emailed): May 7 to July 31, 2024. Participant input is included in the table in Appendix [section 2](#). Full submissions are presented in Appendix [section 5](#).

Name	Affiliation
Ira Webb	City of Whitehorse
Yasmin Tarmohamed	Canadian Vehicle Manufacturers' Association

4. Full Survey Responses

Q1

Full Name (first & last)

Amal Ghamrawi

FCA Canada Inc.

Q2

Email Address

amal.ghamrawi@stellantis.com

Q3

Organization Representing (if you don't represent a specific organization please type N/A)

FCA Canada Inc.

Q4

Background for your interest in the draft Interchange Recycling Yukon EPR Plan

Other (please specify):

Producer

Q5

Do you support the draft Interchange Recycling Yukon EPR Plan?

Yes, subject to specific revisions or with clarifications added

Q6

Please describe the Plan revisions or clarifications you would like to see, indicating the relevant Plan section number before each recommendation.

- Concerned with the 10% annual improvement for collection - this may not be feasible if the baseline year collection is at 80% for example
- Transportation costs and the population distribution of Yukon will make it difficult to reach the targets increasing 10% annually
- Concerned about "Free-riders" when collected non-targeted material

Page 3

Q7

Respondent skipped this question

Please explain why you do not support the draft Plan in its entirety.

Page 4

Q8

Respondent skipped this question

Do you have any further comments on the draft Plan?

Q1

Full Name (first & last)

Aynstie Ogden

Q2

Email Address

corporate@hainesjunction.ca

Q3

Organization Representing (if you don't represent a specific organization please type N/A)

Village of Haines Junction

Q4**Local Government (Regional, Municipal, Community)**Background for your interest in the draft Interchange
Recycling Yukon EPR Plan**Q5****Yes, subject to specific revisions or with clarifications
added**Do you support the draft Interchange Recycling Yukon
EPR Plan?**Q6**

Please describe the Plan revisions or clarifications you would like to see, indicating the relevant Plan section number before each recommendation.

The presentation indicated that infrastructure grants will be offered to SWFMs to support improved facility standards. We'd like more details on this.

You indicated that you will work with local governments to deliver equivalent services as provided in Yukon in 2022 (including Haines Junction's HHW day). We anticipate requiring an increased schedule due to the anticipated increase in drop-offs at the facility as a result of regionalization (e.g. we may need/want to increase the number of HHW days to 2 or 4 x year)

You have also indicated you will work with local governments to better define reasonable and free access to collection facilities/services. Note the Village of Haines Junction is required to developing a tipping fee structure under our regionalization agreement. We need clarification if the intention is that we would pass fees along to Interchange Recycling for what is dropped off at our facility instead of charging whomever is dropping the materials off.

Page 3

Q7**Respondent skipped this question**

Please explain why you do not support the draft Plan in its entirety.

Page 4

Q8

Do you have any further comments on the draft Plan?

Thank you for the opportunity to comment.



Q1

Full Name (first & last)

Cam Lockwood

Town of Watson Lake

Q2

Email Address

cao@watsonlake.ca

Q3

Organization Representing (if you don't represent a specific organization please type N/A)

Town of Watson Lake

Q4

Local Government (Regional, Municipal, Community)

Background for your interest in the draft Interchange Recycling Yukon EPR Plan

Q5

Yes, as written

Do you support the draft Interchange Recycling Yukon EPR Plan?

Q6

Respondent skipped this question

Please describe the Plan revisions or clarifications you would like to see, indicating the relevant Plan section number before each recommendation.

Page 3

1 / 2

Yukon EPR Plan Consultation Feedback Form - 2024

Q7

Respondent skipped this question

Please explain why you do not support the draft Plan in its entirety.

Page 4

Q8

Do you have any further comments on the draft Plan?

Looking forward to the service being offered.

Q1

Full Name (first & last)

Scott Boulton

Ford Motor Company
of Canada, Limited

Q2

Email Address

sboulto1@ford.com

Q3

Organization Representing (if you don't represent a specific organization please type N/A)

Ford Motor Company of Canada, Limited

Q4

Interchange Recycling Member

Background for your interest in the draft Interchange Recycling Yukon EPR Plan

Q5

Yes, subject to specific revisions or with clarifications added

Do you support the draft Interchange Recycling Yukon EPR Plan?

Q6

Please describe the Plan revisions or clarifications you would like to see, indicating the relevant Plan section number before each recommendation.

Committing to a 10% year over year increase without first understanding what the baseline is, is not appropriate. If it is already at a high percentage then you may be committing to targets that you will not be able to achieve.

While I recognize that contamination is a problem, this should be dealt with at the source so that it is not collected or at least minimized. What you are proposing is setting up free-riders and adding costs to companies and their customers who may not even supply/purchase this material. Given that you have indicated that processing cost are likely to be higher due to transportation costs, it is not appropriate to just add these costs to members. Rather the program could be expanded at a future date with supporting regulation that ensure the responsible producers are responsible.

Page 3

Q7

Respondent skipped this question

Please explain why you do not support the draft Plan in its entirety.

Page 4

Q8

Respondent skipped this question

Do you have any further comments on the draft Plan?



Q1

Full Name (first & last)

Jerry Tracey

Village of Haines
Junction (2 of 2)

Q2

Email Address

pwmanager@hainesjunction.ca

Q3

Organization Representing (if you don't represent a specific organization please type N/A)

Village of Haines Junction

Q4

Local Government (Regional, Municipal, Community)

Background for your interest in the draft Interchange Recycling Yukon EPR Plan

Q5

Yes, subject to specific revisions or with clarifications added

Do you support the draft Interchange Recycling Yukon EPR Plan?

Q6

Please describe the Plan revisions or clarifications you would like to see, indicating the relevant Plan section number before each recommendation.

Section 10 - Current HHW days do not encompass the need for material removal. While the grant is appreciated by municipalities, some require more material removal than the HHW day provides. As such tipping fees were thought to lift this burden. Under this program with no fees allowed will allowance be made for material removal based on accumulation not just a single day per year?

Page 3

Q7

Respondent skipped this question

Please explain why you do not support the draft Plan in its entirety.

Page 4

Q8

Respondent skipped this question

Do you have any further comments on the draft Plan?

Q1

Full Name (first & last)

Tammy Giroux

General Motors
of Canada

Q2

Email Address

tammy.giroux@gm.com

Q3

Organization Representing (if you don't represent a specific organization please type N/A)

General Motors of Canada

Q4

Interchange Recycling Member

Background for your interest in the draft Interchange Recycling Yukon EPR Plan

Q5

Yes, subject to specific revisions or with clarifications added

Do you support the draft Interchange Recycling Yukon EPR Plan?

Q6

Please describe the Plan revisions or clarifications you would like to see, indicating the relevant Plan section number before each recommendation.

Material collection targets: the plan should not specify that collection will increase by 10% each year in year 3-5 until the baseline is established. 10% increases every year may not be feasible or may require significant new resources to develop. Targets collection growth should be set as aspirational or propose a range that continuous improvement is desired and if reasonable target collection will increase between 3-10%.

Materials covered: plan indicates that in addition to covered containers the program is directly targeting that it will include other empty containers such as sealers, conditioners, boosters, solvents, WWF etc. Without understanding the volume of these other containers, it seems premature to indicate they will be included without costing provided. Producers of those other products will not be providing any funding which means they are essentially free riders in this program with expenses paid by the regulated producers. I do not support the automatic inclusion of these materials. A study or analysis needs to be done to determine the amount that could be collected, the cost and if important producers are missing from the obligated parties. This is a significant concern with the proposed plan.

Page 3

Q7

Respondent skipped this question

Please explain why you do not support the draft Plan in its entirety.

Page 4

Q8

Do you have any further comments on the draft Plan?

Running a program in the far north is new and many elements are unknown.

The plan has very little information about how the program will actually work or any information about costs. It's important to continue developing the plan and consulting with producers. New EPR programs are coming online in many provinces and territories and the experience for Producers has been mixed and in many cases frustrating. Information being released too late in the process. No guidance available, IT systems delayed. All of these things impact the overall effectiveness of the desired program and achieving the stated objectives.

Q1

Full Name (first & last)

Wakefield Canada Inc.

Mageswaran Palany

Q2

Email Address

mpalany@wakefieldcanada.ca

Q3

Organization Representing (if you don't represent a specific organization please type N/A)

Wakefield Canada Inc.

Q4

Interchange Recycling Member

Background for your interest in the draft Interchange Recycling Yukon EPR Plan

Q5

Yes, as written

Do you support the draft Interchange Recycling Yukon EPR Plan?

Page 2

Q6

Respondent skipped this question

Please describe the Plan revisions or clarifications you would like to see, indicating the relevant Plan section number before each recommendation.

Q7

Respondent skipped this question

Please explain why you do not support the draft Plan in its entirety.

Page 4

Q8

Respondent skipped this question

Do you have any further comments on the draft Plan?



5. Full written Submissions

City of Whitehorse



City of Whitehorse
2121 - 2nd Avenue, Whitehorse, Yukon Y1A 1C2 Bus: (867) 667-6401 Fax: (867) 668-8398

Will Burrows
Interchange Recycling
536 Broughton Street
Victoria, BC
V8W 1C6

Re: DRAFT Stewardship Plan Yukon: Lubricating Oil, Antifreeze, Diesel Exhaust Fluid, Empty Automotive Containers, Oil Filters

Dear Mr. Burrows,

Thank you for the request for feedback on Interchange Recycling's Draft Stewardship Plan. Please see the following list of comments and questions submitted on behalf of the City of Whitehorse (the "City").

Sincerely,

A handwritten signature in blue ink that reads 'Ira Webb'.

Ira Webb
Associate Manager, Solid Waste
Ira.Webb@whitehorse.ca
867-687-5864

cc Tracy Allen, Director of Infrastructure & Operations





Interchange Recycling Draft Stewardship Plan Comments

4. Materials Covered

- Please explain how the collection of additional unobligated containers integrates with the proposed stewardship program for packaging and paper products. Is there a financial transfer between PROs?
- What are the proposed acceptable levels of contamination for the different obligated materials? i.e. acceptable percentage of non-obligated containers, acceptable percentage of contaminants in waste oil, etc.
- What are the potential penalties to a collection facility for contamination above acceptable thresholds?

6. Key Performance Indicators and their Measurement

- The draft plan proposes establishing target material capture rates after year 2 of the program. Will there be opportunity for feedback on these proposed targets following year 2?
- Since capture rates will not be used, what are the proposed alternative performance metrics to be used in years 1 and 2?

10. Free and Reasonable Collection (Hazardous Products)

- To clarify our understanding of the draft plan, is Interchange's intention to work with the existing collection scheme in place at the City's Solid Waste Management Facility (SWMF) or to expand collections beyond one day per week? What is the targeted level of access to an RCF for DIY Consumers in Whitehorse?
- If a weekly collection schedule is maintained, in addition to the volume-based incentive, is Interchange proposing to cover all removal/disposal costs or to offer a fixed weekly payment?
- Do the modified sea-containers offered to RCFs remain property of Interchange or is ownership of the container transferred to the RCF?
- To clarify, the number of HHW Days offered in Whitehorse in 2022 was 3; however, as of February 2024 the City holds weekly collection days. Is the plan committing to provide for the same service levels as in 2022 or the current service levels?
- Please note that if Interchange is proposing to establish a collection facility on City property and the City chooses not to register as a collection facility, this would need to be facilitated through a lease agreement approved by Council.
- Are there alternative options being considered for a return collection facility if the City does not agree to continue as a collection site or offer space for Interchange to operate a collection site?





12. Fair Compensation

- What is the proposed volume-based incentive for operating a Return Collection Facility and how is this calculated?
- The draft plan notes support for HHW days in the form of a fixed payment per event and educational materials, as well as a volume based payment to the collector. How is this fixed payment amount determined?
- If an incentive does not fully cover associated operating costs for a SWMF, can this be amended based on the facility's actual costs to provide for collection?
- The table in Section 12 states that "SWMF operators may benefit from revenue opportunities, where negotiated with collectors and/or processors. Please elaborate on these potential revenue opportunities and how likely they are to be realized.

13. Public Awareness

- Are there additional financial incentives provided to SWMFs for promotion and education costs?

14. Dispute Resolution

- The proposed dispute resolution process does not seem to recognize that in some instances independent service providers or small local governments may be disadvantaged due to financial and human resource strain imposed by dispute resolution and arbitration. How do you plan on addressing this potential disadvantage to ensure this process is fair to small service providers?

15. Annual Report and Records Submission

- The last bullet under *Annual Report* states "in the future". Please provide a less abstract timeframe for describing how materials are managed in accordance with the waste management hierarchy.

Canadian Vehicle
Manufacturers' Association



Canadian Vehicle
Manufacturers' Association
Association canadienne
des constructeurs de véhicules

116 Albert Street
Suite 300
Ottawa, ON K1P 5G3

Tel: 416-364-9333
info@cvma.ca
www.cvma.ca

July 23, 2024

Ms. Kelly Duran
Communications Director
Interchange Recycling
536 Broughton Street, 3rd Floor
Victoria, BC V8W 1C6

Subject: Consultation on the Proposed Yukon Stewardship Plan – Interchange Recycling

Dear Ms. Duran:

The Canadian Vehicle Manufacturers' Association (CVMA) representing Ford Motor Company of Canada, Limited, General Motors of Canada Company, and Stellantis (FCA Canada Inc.), appreciates the opportunity to comment on the Proposed Stewardship Plan developed by Interchange Recycling for the Yukon EPR requirements. We note that the Interchange's proposed Plan to the Government of Yukon covers the regulated categories of materials, described in Schedule 1 of the Yukon EPR regulation (Lubricating Oil, Antifreeze, Diesel Exhaust Fluid (DEF), Empty Automotive Containers up to 55 litres* and Oil Filters).

We have concerns with some of the elements in the proposed Stewardship Plan. They are as follows:

- The proposed plan should not commit to an annual 10% improvement of the collection rate when the baseline has yet to be determined. The targets in the proposed plan should be aspirational or identify a range (3 to 10%) based on barriers and opportunities in the Yukon and the timelines necessary to address inefficiencies. Better information and experience are required before the specific annual number is outlined in the plan.
- The plan should focus on addressing the materials outlined in Schedule 1 of the EPR regulation and not go beyond. We are extremely concerned that the targeted material identified for collection includes other containers such as windshield washer fluids, boosters, solvents, sealers etc. This is a significant issue as no information is provided about the proportion of the total collection it could represent or the cost of managing these materials. The plan as written is setting up a situation where "free riders" would be created and obligated producers will be forced to pay for the collection and recovery of products that aren't theirs. We are of the strong view that the plan needs to remove these other containers and remain aligned with the regulatory obligations. The plan should ensure that producers can meet the current requirements but include the flexibility to expand should the Yukon require additional materials/producers in the future.

Members:

Ford Motor Company of Canada, Limited

General Motors of Canada Company

Stellantis (FCA Canada Inc.)



- 2 -

We trust that our comments will be considered and recommend that Interchange share the updated Product Stewardship plan with producers before it is submitted to the government. In addition, we would like to meet with you to discuss our input.

Yours sincerely,

A handwritten signature in black ink that reads 'Yasmin Tarmohamed'.

Yasmin Tarmohamed
Vice President, Environment and Engineering

cc: D. Lawes, Interchange Recycling
N. Baranova, Yukon Environment