



Interchange
Recycling

Extended Producer Responsibility Plan

*Lubricating Oil, Oil Filter Products, Antifreeze Products,
Empty Automotive Containers*

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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/>

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Supplementary Documents:

- Appendix A: [Performance Measures, Targets and Reporting Commitments](#)
- Appendix B: [Consultation Processes, Feedback and Attendees](#)
- Appendix C: [Product Design and Use Trends](#)
- Appendix D: [Recycle BC – Future State Overview](#)

1 Acronyms

The following acronyms and abbreviations are commonly used throughout this document.

EHC	Environmental Handling Charge
EPR	Extended Producer Responsibility
Interchange	Interchange Recycling, formerly the BC Used Oil Management Association (BCUOMA)
IZWTAG	Indigenous Zero Waste Technical Advisory Group
RCBC	Recycling Council of BC
RCF	Return Collection Facility
RI	Return Incentive
SABC	Stewardship Agencies of BC
UOMA	Used Oil Management Associations of Canada

2 Overview

Interchange Recycling is a not-for-profit society formed under the British Columbia Society Act in 2003. Interchange's mandate is to ensure the responsible collection and management of the used oil, antifreeze, filters and containers required under the [BC Recycling Regulation](#).

Since its inception, Interchange has improved collection and recycling performance in all regions of the province – and across all product categories. The commitment to continuous improvement remains a major focus in this EPR Plan.

Interchange has operated a province-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 program is funded by its producer members through an EHC on the sale or commercial use of new products. Each Interchange member determines if and how it will recover its costs for the Interchange charge. Interchange produces audited annual financial statements outlining the fee revenue and program expenditures.

3 Legal Requirements

The [Recycling Regulation](#), replacing the Post-Consumer Residual Stewardship Program Regulation, was brought into law on October 7, 2004. Under authority of the [Environmental Management Act](#), the regulation sets out the requirements for EPR in British Columbia. Referred to as members, Interchange represents the

producers of designated products appointed to carry out their legal obligations in accordance with the approved plan. This EPR Plan is submitted in conformity with Section 4 of the regulation.

The list of members that have appointed Interchange to carry out the duties of the producer under Part 2 of the regulation is available [here](#) on the Interchange website.

3.1 Products Covered under the Plan

Schedule 2 of the Recycling Regulation defines the products managed under each of the categories of used lubricating oil, antifreeze, oil filters and oil and antifreeze containers.

In addition to oil and antifreeze containers, the Interchange program will include empty containers (HDPE, metal, non-HDPE, multi-layer plastics, aerosols, other) that contained products intended for the uses below. Within 8 months of the EPR Plan approval, Interchange will begin collection of these additional containers, which represent a subset of the products identified in Schedule 5 of the Recycling Regulation.

- 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)

While the program was originally designed to collect oil or antifreeze containers, these similar containers have found their way into the Interchange collection stream. Many of the additional container types are considered contamination in the current collection stream and by including more types in the Interchange program, the total amount captured will increase. The contamination cost of the non-program containers is approximately \$300K per year.

As communicated in the 2022 consultation materials for the container expansion ([Appendix B.2](#)), Interchange expects very few resulting operational changes. This means that all automotive containers will fall under the existing funding, collection and incentive models, and Interchange's performance measures will remain the same. For reference, [Appendix D](#) includes an overview of a possible future state, prepared by Recycle BC..

4 Governance and Financing

Interchange's producer members, through networks of both company-owned and independently owned retail and wholesale facilities, bring lubricating oil, automotive antifreeze and filters into the province for sale or distribution. Retail facilities range from self-serve gas bars to mass merchandise marketers, quick lube shops, radiator shops, and automotive, farm, marine and commercial equipment dealers. Wholesale lubricating oil facilities comprise both branded bulk plants, and independently owned and brand owner warehouses.

4.1 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 also works closely with other used oil management associations in Canada to harmonise operations and minimize costs.

A listing of all [Board Members](#) and their affiliations is provided on the Interchange website and reported in the Annual Report.

4.2 Bylaws

[Interchange bylaws](#) outline how the organization will operate. The bylaws are available on the Interchange website in the members' section.

4.3 Annual General Meeting and Annual Reporting

Interchange holds an Annual General Meeting (AGM) that is open to the public to attend. At the meeting, Interchange's producer members vote on items such as Director appointments, bylaw changes, and governance structure. The members also use the AGM to select an independent financial auditor for the next year.

An [Annual Report](#) is released to the members and the public at the AGM. The report outlines the financial and operational performance of Interchange over the last year and includes an Audited Financial Statement and an Independent Non-financial Information Review Report. The report is submitted to the Ministry of Environment for review against the requirements in the [Recycling Regulation](#) and approved EPR Plan.

4.4 Program Financing

Interchange collects [Environmental Handling Charges](#) (EHCs) from its producer members. Varying by product type, size and material recyclability, the EHCs are set by the Board of Directors and approved by the members. The fee may or may not be passed on to the consumer as a separate charge by the member or downstream seller.

5 Product Available for Collection

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

The methodology used in calculating the product available for collection for each material type is detailed in the table below, and examples of the types of product uses that are considered consumed in use and repurposed are further described following the table.

Product (unit of measure)	Sold	Consumed in Use	Re-purposed	Available for Collection
Used Oil (Millions of Litres)	Reported litres	Average percentage of used oil consumed through normal usage across major categories of use as supported by the most recent third-party study	Estimated number of litres of used oil directed to uses outside of the Interchange program annually as supported by the most recent third-party study*	Reported litres sold less consumed in use less re-purposed
Filters (Units)	Reported units	n/a	n/a	Reported units
Automotive Containers (Millions of Kgs)	Reported litres of containers converted to kgs	n/a	n/a	Reported litres of containers converted to kgs
Used Antifreeze (Millions of Litres)	Reported litres	Average percentage of used antifreeze consumed through normal usage across major categories of use as supported by the most recent third-party study	Estimated number of litres or % of litres sold of used antifreeze directed to uses outside of the Interchange program annually as supported by the most recent third-party study**	Reported litres sold less consumed in use less re-purposed

* Based on the most recent study results, it is likely that the quantity of used oil re-purposed annually is more accurately estimated to be a constant quantity than a fixed percentage of the quantity sold each year.

** As of the date of this Plan submission, Interchange has not developed an accurate estimate of re-purposed antifreeze and has not deducted any quantities of used antifreeze in its available for collection estimates.

Lubricating Oil

- A portion of the lubricating oil supplied into BC 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. An example of a lubricating oil use where there is a significant consumed in use factor is for automotive uses. 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 BC is re-purposing by the owners. Interchange studies identify that volumes of used oil are directed by the owner of the material to purposes such as burner fuel, explosive manufacturing, cement/lime manufacturing and fish/pleasure boats. “Unaccounted Used Oil” studies are also completed periodically to update the available for collection estimates.
- Landfill audits and illegal dumping studies done by local governments demonstrate that there is very little, if any, used oil being disposed.

Antifreeze

- Antifreeze is sold in concentrated and diluted form. Interchange tracks the quantities of each form sold to calculate the volume sold and available for collection.
- Interchange has been operating an antifreeze program since 2011, and other provinces have since started programs. 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 continue to study the estimated “Unrecoverable Antifreeze” and is also conducting its own studies.
- Interchange is committed to continuing to conduct usage studies to further refine consumed in use estimates and to obtain information on the purposes and quantities of used antifreeze that are re-purposed with the goal of increasing capture rates for used antifreeze.
- Completing by fall 2025, Interchange is conducting a follow-up to its 2020/2021 BC-specific study of the estimated amount of antifreeze that is repurposed, consumed in use, or lost in service and therefore unrecoverable, and to delve deeper into any improperly disposed quantities which are bypassing the recovery stream. The information from this study will inform the measures used to determine Interchange’s antifreeze collection performance, as detailed in [Appendix A](#).

- As more information on where uncollected used antifreeze quantities are being directed becomes available, Interchange will continue to develop education and program initiatives to increase antifreeze capture rates. Landfill audits and illegal dumping studies done by local governments demonstrate that there is very little, if any, used antifreeze being disposed.
- As part of the communications and awareness strategy, Interchange will work to better educate the public on the environmental and economic benefits of returning their used antifreeze for recycling at no charge, to one of the program’s many public collection facilities around the province.

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 estimates of these quantities are not currently deducted from the Interchange estimates of oil filters available for collection.

Automotive Containers

- It is assumed that all automotive containers sold into the marketplace are available for collection. Interchange’s varying fee approach will continue to reflect the complexity and cost to manage each product type.
- Many Interchange producer members are partners of the [Canada Plastics Pact](#) and, as such, have already committed to improving the recyclability of their plastic packaging. Interchange will continue to support its members in their ongoing efforts.

Interchange commits to the continuing completion of studies that inform the “available for collection” used in calculating its recovery rates for the various products the program includes. These studies are posted in the [Resources & Reports](#) section of the Interchange website. Interchange commits to maintaining or improving the baseline capture rates as presented in [Appendix A](#) to this Plan.

The table below indicates the planned update cycle for these key studies. Where appropriate, due to the particular nature of the material or its sales or usage in BC, studies will be conducted provincially; otherwise studies will be conducted nationally or internationally in conjunction with other used oil management organizations.

Product	Consumed in Use Study Update Frequency	Re-purposed Update Frequency	Unit/weight Conversion Factors Update Frequency
Used Oil	5 years	5 years	n/a
Used Antifreeze	5 years	5 years	n/a
Filters	n/a	n/a	5 years
Automotive Containers	n/a	n/a	5 years

6 Collection

Of all the oil and antifreeze collected in BC, most (approximately 95%) is collected from commercial facilities such as service stations, lube shops and large commercial operations (e.g., mining, forestry and agriculture). These commercial facilities are typically serviced by a Interchange [Registered Collector](#) that has a service agreement with the facility. Approximately 5% of the oil and antifreeze collected in BC comes from consumers that change their own oil/antifreeze or small commercial operators that choose to use the Registered Return Collection Facilities (RCFs) offered for free consumer drop-offs, which are also serviced by Interchange's Registered Collectors.

6.1 Commercial Collection (~95%)

The commercial collection system includes roughly 4,000 generators around the province. This 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/antifreeze that is kept clean is more likely to be processed and re-refined as new lubricating oil or antifreeze.

Commercial facilities choose the Registered Collector with which they want to enter into a service agreement. These agreements often outline the collection frequency, collection requirements and any payments or charges. These agreements are between the facility and the collector and do not involve Interchange, although Interchange does provide financial incentives to collectors and processors based on collection volumes and locations. The collectors have supply arrangements with processors that manage used oil, antifreeze, filters and containers.

Some small commercial operations choose to use the consumer recycling system and transport their used oil, antifreeze, filters and containers to a Registered RCF. Access to a RCF is therefore significantly less important for commercial collection than for consumer collection. While Interchange does not put volume restrictions on drop-offs, the recycling facilities typically do. If a large volume will be dropped off, it is recommended that the RCF be contacted in advance to ensure they have the capacity to accept it.

Given that the vast majority of Interchange products are collected through the commercial system, the product capture rate (see [section 7.3](#)) is considered the measure that best reflects Interchange's performance in this stream.

6.2 Consumer Do-it-Yourself (DIY) Collection (~5%)

For DIY consumers who choose to change their own oil or antifreeze, Interchange has a province-wide network of approximately 300 registered recycling centers that provide consumers with free access for recycling. These RCFs are conveniently located at facilities 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.

In addition, there are over 1,000 professional lube shops located across BC where consumers can take their vehicle to have their oil, oil filter and antifreeze changed. These facilities are located to coincide with the demand. Materials collected at professional lube shops are taken directly from the vehicle and placed in storage infrastructure. These materials are picked up by a Registered Collector on a frequent basis and are less contaminated, making them more suitable for re-refining.

Given the low product volumes represented by consumer collection, accessibility to recycling is considered the measure that best reflects Interchange's performance in the consumer/DIY stream. Interchange has completed multiple studies to analyze the collection network, measure accessibility, and customize an accessibility approach that supports the user types. The past work done by Interchange to understand and develop a return network to service its specific user needs is unmatched by any program in Canada. Interchange's customized accessibility approach will be applied, providing an enhanced and aspirational level of service across BC.

In its [Annual Report](#), Interchange will report accessibility performance, addressing any service gaps (e.g., remote areas) as determined appropriate.

6.2.1 Interchange Recycling Centers

In recent years, Interchange made significant changes to its [consumer collection program](#) to improve the consumer experience and environmental performance at the facilities. Interchange invested in new infrastructure such as modified sea containers with spill containment, collection tanks and consumer friendly signage and has developed standardized training for facility operators. Interchange also increased the Return Incentive (RI) rate provided to facilities for the litres of consumer oil/antifreeze collected.

Interchange offers [Infrastructure Grants](#) to registered local governments, private businesses, non-profit organizations and other sectors that require additional infrastructure for their public RCFs.

Interchange also intends to work with the residential curbside collection system in BC to ensure that the expected few automotive containers discarded by consumers at residential premises into the curbside system are collected and managed. It is preferred that consumers bring automotive containers to Interchange recycling centers as containers discarded in curbside systems may cause contamination and other environmental issues.

A current list of RCFs by municipality is provided in each [Annual Report](#) and the search tool on the Interchange website.

6.2.2 Additional Consumer Collection Approaches

Interchange offers mobile (to the household) collection services in specific areas where a permanent consumer collection site may be in transition or under development. Mobile collection options are communicated through the RCF search tool for specific communities, and individual collections are scheduled through Interchange's booking system.

Interchange also provides financial support for community collection events operated by Regional Districts, municipalities, and community groups. The events are often multi-material events that are supported by other stewardship programs and provide residents with an opportunity to recycle several products at the same location. Organizations are invited to apply for the Interchange [Round Up Event Grant](#), offered with the goal to help increase the number of free collection events available to residents across BC.

These events are geared to communities that are interested in having an event in place of a facility, or as a consumer awareness initiative in communities that already meet the service level. Interchange's support of collection events is supplemental or community-optional to meeting Interchange's accessibility standard.

In a partnership with the Indigenous Zero Waste Technical Advisory Group (IZWTAG), and in addition to establishing permanent collection infrastructure in Indigenous communities, Interchange also supports one-off collection of Interchange materials in Indigenous communities. IZWTAG takes the lead in determining the appropriate approach and frequency for servicing these communities, and Interchange provides logistical and financial support to ensure the safe and timely collection of their program materials.

Each Interchange [Annual Report](#) will include a reporting of the community collection events supported by grants and will also describe the frequency and use of other collection methods used as alternatives to a physical location (e.g., mobile collections) in providing collection services to consumers.

6.2.3 Accessible Consumer Collection Calculation

The Interchange methodology for determining the percentage of the BC population adequately served by an Interchange accessibility standard is determined as follows:

1. All of the British Columbia population is assigned to a Census Subdivision (CSD) according to Statistics Canada (SC) definitions and data.
2. Interchange groups the CSD definitions into the following community types:
 - a. City – as defined by SC
 - b. Town – as defined by SC
 - c. Village – as defined by SC
 - d. Other – all other CSDs as defined by SC

3. City and Town are subdivided by Interchange into High Industrial and Low Industrial based on population and Industrial activity from select used material-producing sectors in the community (see table below).
4. The service standard is assessed for each community (see table below).
5. Collection facility locations are entered/maintained in the model on an ongoing basis.
6. The % of the BC Population that is adequately served by the RCF collection network is calculated by adding up the population total from the communities meeting the standard.

Community Type	Population Characteristics	Business Establishment Characteristics	Interchange Service Level for current Plan (see Notes)
City, High Industrial	> 5,000	> 20 per 10,000	One facility per 100,000 people
City, Low Industrial	> 5,000	20 or less per 10,000	One facility per 200,000 people or one facility within a 15-minute drive if the population is <200,000
Town, High Industrial	2,501 - 5,000	> 50 in total	Minimum one facility
Town, Low Industrial	2,501 - 5,000	50 or less in total	Minimum one facility or one facility within a 15-minute drive or collection event
Village	1,000 - 2,500	N/A	Minimum one facility or one facility within a 30-minute drive or collection event
Other	< 1,000	N/A	Minimum one facility or one facility within a 30-minute drive or collection event

Notes:

- When a facility is not within a 30-minute drive, communities with fewer than 1,000 residents will have the option of one collection event per year.
- Interchange will initiate, at a minimum, annual outreach to communities that have previously participated in collection events.

Key inputs to the Interchange model are updated as indicated below.

Input	Source	Update Frequency
BC Population Estimates	Statistics Canada, updated annually based on BC Stats data until new Census data becomes available	Updated annually based on BC Stats estimates until new Census data becomes available
Census Subdivisions	Statistics Canada	Updated when new Census data becomes available

Input	Source	Update Frequency
Community Types	Statistics Canada	Updated when new Census data becomes available
Google average drive times	Google	Reviewed and updated annually

7 Transportation and Processing

7.1 Incentive System for Province-wide Collection Coverage

Interchange has designated multiple collection zones across BC. Used oil, oil filters, antifreeze and automotive containers are regularly picked up from roughly 4,000 generators and consumer Return Collection Facilities by Registered Collectors. Collectors are required to ship the collected materials to an Interchange Registered Processor for an approved end use. Any approved end use must be environmentally sound and be in compliance with environmental requirements.

A map of the [provincial zones](#) and additional collection information is available on the Interchange website.

7.2 Registered Collectors and Processors

Interchange registers the collectors and processors before they are eligible to participate in the program. Under the [Hazardous Waste Regulation](#), used oil, automotive antifreeze and oil filters are considered hazardous wastes. Containers also often contain a certain amount of new oil or antifreeze, and measures are required to ensure that proper equipment and vehicles are used for their transport. As a result, it is important that any collectors and processors handling used oil and antifreeze materials are doing so in compliance with the required environmental standards.

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

7.3 Product Collection (Capture Rate Measurement)

As Interchange is a mature program, collection is projected to remain stable, consistent, and notably higher than the 75% identified in the Recycling Regulation. For reporting purposes, Interchange calculates product recovery as follows:

Product Sold – Consumed in Use – Re-purposed = Available for Collection

Collected / Available for Collection = Capture Rate

Interchange will demonstrate continuous improvement by further improving the precision of the measurements used in its methodology to determine the products unavailable for collection, and by continuing to investigate where uncollected material may be re-purposed by the user or disposed.

The total sales of each product, the products available for collection, and the product capture rates against provincial targets will be reported in Interchange's [Annual Report](#). The oil, antifreeze, filters and automotive containers collected in a calendar year by Regional District/by collection stream will also be reported.

7.4 Product Management

In its Annual Report, Interchange commits to reporting on how collected products were managed in accordance with the Pollution Prevention Hierarchy (PPH). In annual reporting, end-of-life management will be reported on in accordance with these industry definitions:

Recycling: Any operation by which end-of-life products or materials are reprocessed into new products, materials, or substances (solids, liquids, or gases), whether for original or other purposes, to replace virgin equivalents of that material. This excludes the use of these materials as a fuel substitute or for energy production.

Energy Recovery: Any operation which converts end-of-life products or materials into useable energy in the form of heat, electricity, or fuel but causes them to lose their functionality as a replacement for virgin equivalents of that material. This would include landfill gas capture systems but only for the proportion of inbound material that is biogenic.

Interchange will ensure that its Annual Reports use definitions consistent with the PPH language set in the Regulation as applied and described specifically for the products in the EPR Plan.

An estimated 69% of used oil is turned back into new lubricating oil with the remaining 32% sold in the marketplace as a raw material commodity. All collected antifreeze is turned back into new antifreeze

products. An estimated 98% of filters are recycled into metal products and 2% are used for energy recovery. All containers collected are processed and sold as raw material commodities.

The following global usage statistics were presented to the 2022 National Used Oil Material and Antifreeze Advisory Council Strategic Planning Session for the 2021 fiscal year (or most recent available).

Jurisdiction	Estimated % Used Oil Re-refining Uses*
World	34%
Europe	45%
United States	37%
Canada	33%
British Columbia	69%

* as reported by Kline & Company Inc.

Of Canada’s UOMA members, only BC reports the end fate of used oil in its annual reports.

There are only 5 operating re-refineries in Canada, the one in North Vancouver being the third largest and generally operating at or near capacity.

7.5 Landfill Audits

Interchange participates in landfill waste audits with local governments and the Stewardship Agencies of BC (SABC) on an annual or semi-annual basis depending on local government scheduling. Interchange will continue to work with local governments on future audits and commits to reporting on audit findings that are relevant to Interchange’s program materials.

8 Paying the Cost of Collection and Management

For all products including the additional automotive containers, Interchange pays the cost of collection and management by providing incentives to the marketplace to drive the desired outcomes. The registered participants own and have the ability to market the material, thereby being in control of their financial outcomes. They can enter and exit the program with minimal notice based on their own evaluation of the economics, logistics, and other factors resulting from their participation in the program.

This incentive system rewards facilities that collect more material. The system differs significantly from the payment systems used by some stewardship programs that set fixed rates for program service providers and retain ownership of the material, thereby pre-determining or limiting a program participant’s financial outcome.

Interchange provides a RI to Registered Processors and Collectors based on the material type and the zones in the province (see [section 7.1](#)) where they get picked up. As noted in this section's introduction, the processors own the material they collect or receive from collectors and market this material for their own benefit. The variable RIs support economic and efficient collection of program materials across all of BC by offsetting the costs of collecting and processing materials at Registered Processing Facilities.

The incentives provided by Interchange are actively managed and reviewed by the association to ensure the desired outcomes are being achieved. Interchange is committed to ensuring that financial incentives are adjusted as required to meet the Plan's accessibility and recovery targets, through fluctuations in the market values of the materials which are collected and managed and the costs of collection and management.

Most residents and businesses have their vehicles serviced commercially (e.g., service station, lube shop) and negotiate service terms with the commercial operation. About 95% of program material is collected at commercial facilities.

Additional Consumer Return Collection Facility Incentives

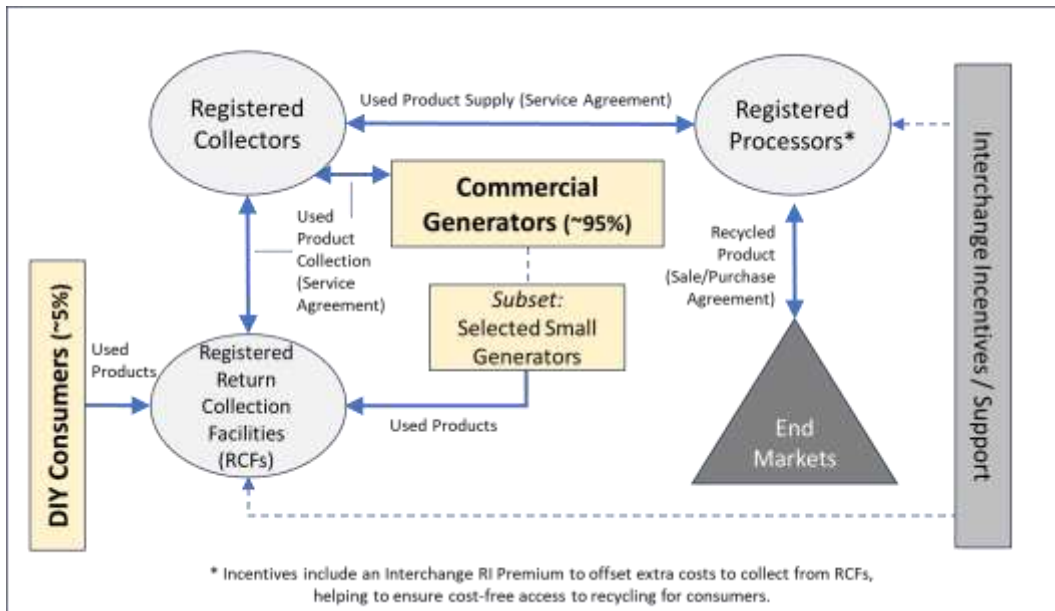
For consumers that choose to service their own vehicles, the used oil and antifreeze can be returned at a Registered RCF at no cost to the consumer. About 5% of program material is collected annually from consumers by these RCFs. To ensure that sufficient no-cost drop off options are available for these consumers, Interchange provides the additional financial incentives described below.

RCFs receive a direct financial incentive from Interchange based on the volumes of oil and antifreeze collected from consumers; this incentive supports the management of all program materials and RCFs are required to receive all program materials. The incentive is paid on oil and antifreeze as their volumes are easily measured at the generation site, while measurement of the weights of filters and automotive containers at the collection site is more challenging. Interchange has and will continue to regularly review the practicality of paying directly on each product type, but the complexity and inaccuracy of doing so has so far outweighed any possible benefits and the collector market, almost exclusively, offers "all product" collection services to RCFs to effectively attract and retain customers.

Interchange also pays a RI Premium on oil and antifreeze volumes collected at RCFs to Registered Collectors to reflect the additional costs of servicing RCFs and ensure there are sufficient no-cost drop off locations for consumers. In order to receive this incentive, collectors must collect all program materials at an RCF and not charge any additional collection fees to RCFs for the pick-ups.

Interchange also supplements the commercial arrangement with RCFs by providing [infrastructure grants](#) and marketing support such as [signage](#) to these facilities. RCFs can be retailers, depots, local governments or other business that choose to enter into an agreement with Interchange and to separately enter into a service agreement with an Interchange Registered Collector.

The following diagram illustrates Interchange’s open market approach, which allows the program’s key participants to determine their financial outcomes. The model reflects the approach for all products, including the additional automotive containers.



Local governments can choose to register as a RCF with Interchange and follow the same rules and procedures as private facilities.

The four cost/revenue components included in the Interchange Program Financial Framework are noted below along with 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	RCF 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 products as a by-product of their normal business operations	A per litre RCF incentive is provided by Interchange directly to the RCF operator to offset site operating costs in return for receiving used oil products at no cost to consumers Infrastructure grants available to RCF operators to support improved facility standards for RCF operators and collectors

Cost/ Revenue Component	Cost/ Revenue Elements Considered	Incentives Provided by Interchange for	
		Commercial Collection	RCF Consumer Collection
			and to allow RCFs to store products 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 products as a by-product of their normal business operations	A per litre Return Incentive Premium is paid to processors for collecting used oil products at RCF locations with a guarantee of not assessing additional pick-up charges to RCF operators RCF operators may benefit from revenue opportunities, where negotiated with collectors and/or processors
Transportation and Management	Fuel Labour Insurance Equipment Overhead costs Market price (cost) Other	A graduated Return Incentive based on defined collection zones and product type is paid to registered processors to offset the costs of transporting and managing products from the generation point to the processing facility	A graduated Return Incentive based on defined collection zones and product type is paid to registered processors to offset the costs of transporting and managing products from the generation point to the processing facility
Processing Costs / Revenue	Processing Costs	Graduated Return Incentives paid to registered processors also, when considered with the net revenues and/or costs of processing these materials, cover the costs of processing materials to Interchange approved processing standards	A per litre Return Incentive Premium is paid to processors for collecting used oil products at RCF locations with no additional pick-up charges to RCF operators RCF operators may benefit from revenue opportunities, where negotiated with collectors and/or processors

8.1 Inputs to the Financial Framework

To inform the Financial Framework under which the Interchange program operates (see 8 above), in 2019 Interchange joined the [Canadian Electrical Stewardship Association](#) (CESA)-led project along with Call2Recycle, the Outdoor Power Equipment Institute of Canada (OPEIC), and the Canadian Wireless Telecommunications Association (CWTA) that invited depot operators to present information about the costs associated with collecting and handling the respective materials at their facilities. This effort culminated in a report dated August 30, 2019 with the following results:

- 221 depots were invited to provide information for this project in the form of a survey response and where applicable a follow-up interview. An average of 2.95 contacts per depot were made to initiate engagement in the project. 5 completed and 27 partially completed surveys were received.
- The overall report and the associated time and motion study concluded that due to low voluntary participation by the depots, the sample size was inadequate to be considered statistically valid and the costing information received was insufficient to form a basis for estimating the actual and specific costs of managing Interchange related materials at depots. However, the study did provide a general conceptual activity-based costing model that was used to inform and validate the Interchange program Financial Framework.

In 2020, Interchange initiated a review of the RI program that provides incentives to registered program participants. The study was led by MNP and included surveys and interviews of registrants, and an analysis of the RI setting methodology. The results of the study were incorporated into the Financial Framework above. MNP provided three specific recommendations to which Interchange has responded.

Recommended Option	Interchange Action
Provide a fuel incentive on top of the existing RI to address the added cost of collecting in remote areas	Effective January 1, 2022, the Interchange zone model was realigned from 11 to 9 zones, which included the zones noted by MNP as requiring realignment, and RI rates were raised in rural zones across the province
Adjust the RI rate in reflection of market conditions for oil	The market price for oil rebounded from the historic lows occurring during the study period and have remained above the pre-study rates
Combine RI zones 3 and 5	Effective January 1, 2022, the Interchange zone model was realigned from 11 to 9 zones, which included the zones noted by MNP as requiring realignment

To inform future RI adjustments, Interchange initiated a Sustainability Review of program participants in 2023 to determine more accurately the costs of collection and processing across all product streams and to help delineate any cross-subsidization between products, recognizing that some products inherently have a positive market value and others have a negative market value.

By January 1, 2026 Interchange will submit the results of its next cost study to the Ministry. This study will gather relevant and up-to-date information from its Registered Collectors and Processors about their operating costs, and develop a clear and transparent methodology for the RI Premium that demonstrates the program adequately covers the costs of collecting and managing products covered by the Plan, as required by the Regulation, Section 5(1)(c)(i).

Interchange will continue to work with commercial generators and Registered Collectors 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 to all Registered Collectors, and that Processors receive high quality materials. Setting of standards for quality, contamination, minimum volumes and methods and location of stored materials will ensure that commercial operators can better manage their commercial agreements with collectors and processors.

Interchange began consultation on a pick-up standards framework aimed to complete by the end of 2023, with a target implementation of mid 2024.

8.2 Dispute Resolution

Interchange requires collectors, processors and collection facilities to register, accept terms and conditions, and follow the requirements to receive payment in the form of a financial incentive from Interchange. Interchange's requirements including [manuals, registration forms and applications](#) are posted on its website.

If there is a dispute between Interchange and a service provider or other stakeholder, the individual consumer or company can take the following actions:

1. Bring the dispute to the Chief Executive Officer;
2. If the matter is not resolved at the previous level, service providers can use normal commercial legal procedures such as BC's [Arbitration Act](#).

Interchange's incentive system supports the competitive commercial market. Interchange has had very few disputes, if any, that would require a more complex dispute resolution system to produce a successful result. More complex processes are likely needed in systems where the financial outcomes of participants are pre-determined which, as highlighted earlier, is not the case with Interchange.

9 Program Marketing and Consumer Awareness

Interchange uses several different channels to ensure timely and relevant program information is always available to the public. Communications tactics include:

- Program website with RCF locator tool
- Social media accounts (Facebook, Instagram, Twitter, YouTube)
- Traditional media campaigns (TV and radio)
- Out of Home media campaigns (bus ads, billboards)
- Digital advertising including Google search
- Media releases and interviews
- Community event ambassadors

Additionally, Interchange works closely with several organizations to increase awareness and encourage positive recycling behaviours. These collaborations include:

- Provincial programs (UOMA) – Interchange is a member of the National Used Oil Material and Antifreeze Advisory Council (NUOMAAAC) which coordinates the Canada-wide used oil and antifreeze materials recycling effort and encourages national standards.
- IZWTAG – Interchange was the first Associate Member this non-profit society dedicated to supporting zero waste systems in all First Nation communities in BC.
- SABC – this alliance of industry product stewardship organizations works with government, service providers and other stakeholders to ensure BC’s extended producer responsibility model is successful and cost effective.
- RCBC – Interchange participates with other stewardship programs to fund RCBC’s public hotline and Recyclepedia database

9.1 Consumer Awareness

Interchange prioritizes consumer awareness for those changing their own oil or antifreeze, requiring drop-offs at consumer RCFs. General consumer awareness is less critical due to high recovery rates and commercial facility contributions.

Surveys indicate most vehicle-owning British Columbians use licensed facilities within Interchange’s commercial network for oil changes. Therefore, public awareness targets have been adjusted accordingly, with separate reporting for RCF user awareness.

To target RCF users, Interchange leverages social media analytics, industry and public surveys, and trade media advertising in sectors like logging, farming, and transportation. Additional outreach includes automotive events and support for Community Collection Events through municipal and Regional District grants.

Interchange participates in the biennial SABC consumer awareness survey and conducts its own annual survey to assess program awareness and information accessibility. Independent third-party providers ensure comprehensive demographic coverage across the province.

Ensuring easy access to program information remains a priority. Interchange will report on these three awareness targets in our [Annual Report](#), aiming for continuous improvement throughout the EPR Plan.

10 Performance Measures, Targets and Reporting Commitments

The Performance Measures, Targets and Reporting Commitments for the term of the Plan can be found in [APPENDIX A](#).

11 Consultations on Plan Implementation and Operation

The Consultation Processes, Attendance and Consultation Feedback for the term of the Plan can be found in [APPENDIX B](#).

With respect to consulting on its ongoing operations, Interchange engages with its stakeholders in a variety of ways.

- Providing the opportunity bring forward questions or concerns to Interchange at any time by direct telephone, email or fax based on information published on the [contact page](#) of the Interchange website.
- Participating in external groups including: the IZWTAG initiative; SABC, which works with government, service providers and other stakeholders; RCBC, to ensure consumer access to Interchange information through its Hotline and Recyclepedia tool; and the National Used Oil Material and Antifreeze Advisory Council (NUOMAAC) for broader stakeholder perspectives.
- Annually surveying the public for feedback on Interchange program awareness.
- Attending community events throughout the province which enables one on one dialogue with the public.
- Regular partnership meetings with key service providers to assist in keeping current on any issues or developing threats to the operation of the program.
- Regular communication to Interchange members to provide key updates/messaging.
- As needed, targeted stakeholder consultations/surveys on specific program matters (e.g., potential program or process changes).
- Dialogue between Interchange member organizations and the director who represents the member on the board, allowing any member concerns to be conveyed to the board and staff.
- Staff attendance at key conferences which enables face to face dialogue with other stakeholders to discuss any specific issues.

APPENDIX A: Performance Measures, Targets and Reporting Commitments

Term: November 2024 – November 2029

Interchange commits to the following targets and reporting:

Metric / Target				Reporting Commitment	Subject to 3 rd Party Review
I. ACCESSIBILITY					
Interchange's accessibility standard for adequate service:				Percentage of BC population with adequate service Target = 95%	Yes
Community Type	Population Characteristics	Business Establishment Characteristics	Interchange Service Level for current Plan (see Notes)		
City, High Industrial	> 5,000	> 20 per 10,000	One facility per 100,000 people		
City, Low Industrial	> 5,000	20 or less per 10,000	One facility per 200,000 people or one facility within a 15-minute drive if the population is < 200,000		
Town, High Industrial	2,501 - 5,000	> 50 in total	Minimum one facility		
Town, Low Industrial	2,501 - 5,000	50 or less in total	Minimum one facility or one facility within a 15-minute drive or collection event		
Village	1,000 - 2,500	N/A	Minimum one facility or one facility within a 30-minute drive or collection event		
Other	< 1,000	N/A	Minimum one facility or one facility within a 30-minute drive or collection event		
Notes: <ul style="list-style-type: none"> When a facility is not within a 30-minute drive, communities with fewer than 1,000 residents will have the option of one collection event per year. Interchange will initiate, at a minimum, annual outreach to communities that have previously participated in collection events. 				Reported in Annual Report (against target)	
Number/locations of Return Collection Facilities (RCFs) with the types of products and volumes accepted at each advertised RCF, and their minimum business hours.				Reported in Annual Report	Yes
Frequency and description of the use of alternative collection methods rather than a physical location (e.g., mobile collections, collection events) in providing collection services to consumer.				Reported in Annual Report	No

Metric / Target							Reporting Commitment	Subject to 3 rd Party Review
Dates, locations and results of collection events.							Reported in Annual Report	No
II. SALES, COLLECTION & CAPTURE RATES								
The Capture Rates below are based on Interchange's 3-year rolling average performance for each material type (2021, 2022 and 2023 for the current term).								
(volumes are rounded)								
Product	Sold	Consumed in Use	Re-purposed	Available for Collection	Collected ⁶	Capture Rate	Reported in Annual Report (Target is year over year improvement from a mature baseline)	Yes
a) Used Oil (Millions of Litres)	86.6	25.4 ¹	16.2 ²	45.1	49.0	109.1%		
b) Filters (Units)	6.5	n/a	n/a	6.5	6.1 ⁵	93.9%		
c) Containers (Million Kgs)	1.9	n/a	n/a	1.9	1.7	93.5%		
d) Used Antifreeze (Millions of Litres)	12.5	7.2 ³	n/a ⁴	5.3	2.4	45.7%		
¹ Average percentage of used oil consumed through normal usage across major categories of use as supported by the most recent study – 29.3% ² Estimated number of litres of used oil directed to uses outside of the Interchange program annually as supported by the most recent study – 16.2 million litres (next study is scheduled for 2024/2025) ³ Average percentage of used antifreeze consumed through normal usage across major categories of use as supported by the most recent study – (2023: 45.28% (as adjusted) / 2022 & 2021: 62.1%) ⁴ Re-purposed antifreeze has not been estimated at this time but is anticipated (a further and more in-depth investigation is needed when the next unaccounted antifreeze study is completed in 2024/2025) ⁵ Weight of filters collected is converted to units collected based on a conversion factor calculated in the latest filter conversion study – 2 filters per kg collected (next study scheduled for 2024/2025) ⁶ Collected quantities and volumes include reallocations between product categories to more accurately reflect the collection of co-mingled materials, like antifreeze included in collected oil volumes. Reallocations will be based on estimates from product studies. There are no current reallocations that are being used in Interchange recovery statistics, but Interchange will be further investigating a national study which suggested quantities of								

Metric / Target	Reporting Commitment	Subject to 3 rd Party Review
antifreeze are recovered and processed as part of the oil collection stream in all provinces, and should be reallocated between material types. Other reallocations may be identified as necessary and will be supported by estimates from future studies.		
By Regional District – Total litres of oil and antifreeze, total filter units, and total kg of containers collected in a calendar year for both the commercial and consumer collection streams.	Reported in Annual Report	Yes
Provincially – Total litres of oil and antifreeze, total filter units, and total kg of containers collected in a calendar year for both the commercial and consumer collection streams compared to the previous year.	Reported in Annual Report	Yes
III. CONSUMER AWARENESS & EDUCATION		
Program Use – <i>General Public</i> : Have you used the program through a mechanic, lube shop or other facility to recycle your used motor oil and antifreeze in British Columbia? TARGET: 85%	Reported in Annual Report (against target)	Yes
Program Awareness – <i>RCF Users</i> : Are you aware there is a program that recycles used motor oil and antifreeze in British Columbia? TARGET: 68%	Reported in Annual Report (against target)	Yes
Information Source – <i>General Public</i> : If you needed to find information about how to recycle used motor oil and antifreeze, do you know where to go to find that information? TARGET: 65%	Reported in Annual Report (against target)	Yes
Description of educational materials and educational strategies used.	Reported in Annual Report	No
IV. PRODUCT MANAGEMENT		
Description of how the collected product was managed in accordance with the Pollution Prevention Hierarchy (PPH) compared to the previous year.	Reported in Annual Report	Yes
Efforts taken to reduce environmental impacts, to increase reusability and recyclability.	Reported in Annual Report	No
V. AUDITS		
Independently Audited Financial Statements.		Yes

Extended Producer Responsibility Plan

Metric / Target	Reporting Commitment	Subject to 3 rd Party Review
Independent Non-financial Information Review Report.	Included with Annual Report	
Results of landfill audit findings where relevant for Interchange products.	Reported in Annual Report (as audits occur)	No

APPENDIX B: Consultation Processes, Feedback and Attendees

Term: November 2024 to November 2029

Introduction

In 2022, Interchange held two separate consultation initiatives that contribute to the content of the February 2023 EPR Plan submission. Details of these separate consultations are presented in this appendix in the following sections:

- [B1. Consultations on the comprehensive EPR Plan \(late 2022\)](#)
- [B2. Consultations specific to expanding the program containers \(early 2022\)](#)
- [B3. Full written comments in response to the comprehensive EPR Plan consultation and listing of attendees at the consultation sessions](#)
- [B4. Full written comments in response to the consultation on container expansion and listing of attendees at the consultation sessions](#)

B1. Consultations on Comprehensive EPR Plan

Consultation Process

An overview of the 2022 EPR Plan Consultation Process was posted on the Interchange 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

Interchange 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

Consultation Feedback and Interchange Responses

The table beginning on the next page summarizes the EPR Plan feedback received through all components of the consultation process together with Interchange's responses, where applicable. While the content focuses on suggestions for change, Interchange 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 Interchange have been condensed without the intent of distorting the original messaging. For transparency, the full text of all written responses is included in section B3 of this appendix followed by a listing of all consultation session 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 Interchange 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

Interchange acknowledges some comments that could not be addressed in this consultation process as they would 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)		Interchange 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 Regional District</i>		Interchange has amended this Plan to add automotive containers in response to the Ministry's suggestion.
2. We recommend Interchange clarify that it handles the residual material left in accepted containers, in addition to the residual oil.	1 <i>District of Squamish</i>		Confirmed. The products covered are outlined in Section 5 of the Plan and oil left in containers is collected, managed and included in the performance reporting for used oil.
Governance & Financing (Board, EHCs) Comments below are from 2 unique Local Governments, 3 unique Service Providers/Other			
1. Interchange 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 Interchange could form an advisory committee consisting of these types of members that would report to the Interchange Board.)	2 (similar) <i>District of Squamish & 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. Interchange 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	1	1	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)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
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.	<i>District of Squamish</i>	<i>Zero Waste BC</i>	
3. There is a troubling discrepancy between Interchange reporting and the DesRosiers findings regarding the recyclability of contaminated containers. Clearly, much of the Interchange 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. Interchange 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 Regional 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	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)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
		<i>Pender Island Recycling Society</i>	
Product Available for Collection Comments below are from 4 unique Local Governments, 2 unique Service Providers/Other			
<p>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.</p>		<p>1 <i>Zero Waste BC</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>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).</p>	<p>1 <i>Metro Vancouver</i></p>		<p>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</p>

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
			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.	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.
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.	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.
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 Interchange 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?	1 <i>Cariboo Regional District</i>		Interchange Unaccounted Used Oil Study can be found on our website: https://interchangerecycling.com/app/uploads/2020/09/2018-Unaccounted-Used-Oil-Study.pdf
6. We appreciate that Interchange 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.	1 <i>District of Squamish</i>	1 <i>Zero Waste BC</i>	We agree trust is important and are pleased to share that, based on survey results, Interchange has achieved a high level of public trust in its system (currently at ~85%).

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
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?	1 <i>Comox Valley Regional District</i>		<p>Every 2 to 3 years. While some are conducted solely by Interchange, we often work with other used oil programs across Canada as our circumstances are similar. Reports from completed studies are posted on the Interchange website.</p> <p>https://interchangerecycling.com/participants/resources-reports/</p> <p>We believe Interchange is using the best possible science based on available information.</p>
8. Do you conduct consumed in use studies for antifreeze like you do for used oil?	1 <i>Metro Vancouver</i>		<p>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.</p>
9. What do you expect the impact of the increasing number of electric vehicles on the road to be on the Interchange program?		1 <i>Nickel Bros</i>	<p>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.</p>

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
Collection (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 Interchange provides to commercial collectors and processors “based on collection volumes and locations”?		1 <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 Interchange’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 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).	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.
3. How do you react to dropping oil prices? Is there a way to make sure you react more quickly?	1 <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

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
			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.
<p>4. Interchange 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 Interchange 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). Interchange'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.</p>	<p>1</p> <p><i>District of Squamish</i></p>	<p>1</p> <p><i>Zero Waste BC</i></p>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
<p>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.</p>	<p>1</p> <p><i>District of Squamish</i></p>		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)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
6. Why doesn't Interchange work with the retailers who sell the product to create collection sites?		1 <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 Interchange. In the program plan there needs to be additional language on Interchange increasing the number and availability of collectors to build the capacity of the Interchange collection network.	1 <i>Columbia Shuswap Regional District</i>		Interchange's 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.	1 <i>Regional District of Bulkley-Nechako</i>		Interchange 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?		1 <i>Product Care</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 Interchange 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.	1 <i>District of Squamish</i>		Interchange 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.

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
11. Events should be used as marketing tools to raise awareness rather than counted as part of accessibility as people are unlikely to store the materials until an event (often irregularly and sporadically timed) may occur.	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.
12. 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.	1 <i>District of Squamish</i>		This information is included with each annual report. The 2022 results are available at: Returns.pdf">https://interchangerecycling.com/wp-content/uploads/2024/01/BCUOMA-2022-Summary-of-Collection-Consumer>Returns.pdf
Transportation & Processing (Incentives, Collection Targets, Prod. Mgmt., Audits) Comments below are from 3 unique Local Govts., 2 unique Service Providers			
1. “The incentives provided by Interchange 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.		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.
2. Are there any changes planned for the incentive rates? Our location is struggling to receive service from our collector.	1 <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

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
			<p>issues that delay the delivery of new trucks/parts.</p> <p>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</p>
<p>3. We appreciate that Interchange is offering grants for infrastructure and think that the program should be paying 100% of the program-specific costs.</p>	<p>1 <i>District of Squamish</i></p>	<p>1 <i>Zero Waste BC</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>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.</p>	<p>1 <i>District of Squamish</i></p>	<p>1 <i>Zero Waste BC</i></p>	<p>The Interchange 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.</p>
<p>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</p>	<p>1 <i>District of Squamish</i></p>	<p>1 <i>Zero Waste BC</i></p>	<p>Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.</p>

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
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.			
6. The TNRD would like to see Interchange increase its capture rates over the term of the Plan. The draft Plan indicates that Interchange 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.	1 <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 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	1 <i>District of Squamish</i>	1 <i>Zero Waste BC</i>	The definitions used by Interchange are consistent with those used by the industry internationally and 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.

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
<p>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.</p>			
<p>8. Oil Filters - The program should work to minimize the non-recyclable components of oil filters so that waste to energy is no longer used.</p> <p>Containers - We encourage Interchange 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.</p>	<p>1</p> <p><i>District of Squamish</i></p>	<p>1</p> <p><i>Zero Waste BC</i></p>	<p>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.</p>

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
<p>9. Section 7.5 Landfill Audits - The use of waste composition audits going forward is useful to see if the containers and filters are being 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 Interchange 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 Interchange products should receive appropriate funds and not need to go through the SABC request system.</p>	<p>1</p> <p><i>District of Squamish</i></p>	<p>1</p> <p><i>Zero Waste BC</i></p>	<p>Interchange partners with other programs on annual waste audits through the Stewardship Agencies of BC (SABC). In the Plan, Interchange has committed to reporting on any findings that are relevant to its products.</p>
<p>10. In the EPR plan it states that Interchange participates in landfill waste audits with local governments. In 2021 the CSRD reached out to Interchange to participate in the Salmon Arm landfill waste audit and did not receive any funding or cooperation from Interchange. Will the Ministry be enforcing the Interchange's EPR approved Plans' commitment to participate in future waste audits?</p>	<p>1</p> <p><i>Columbia Shuswap Regional District</i></p>		<p>As noted in the EPR Plan, Interchange participates in waste audits conducted through SABC.</p>
<p>Paying the Cost of Collection & Management Comments below are from 6 unique Local Governments, 1 unique Service Provider/Other</p>			
<p>1. Interchange 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,</p>	<p>1</p>	<p>1</p>	<p>The Interchange program is unique in that 95% of the volume of materials collected are from commercial locations and that Interchange</p>

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
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.	<i>District of Squamish</i>	<i>Zero Waste BC</i>	<p>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% 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</p>

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
			determine their own methods and costs of operation.
<p>2. 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.</p>		<p>1</p> <p><i>Zero Waste BC</i></p>	Interchange 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.
<p>3. The previous plan amendment noted challenges with local governments collecting other HHW but not Interchange products. The program should work with local governments to understand what the rationale is for not collecting Interchange materials and work to address them. This may be more important as the program expands its product suite.</p>	<p>1</p> <p><i>District of Squamish</i></p>	<p>1</p> <p><i>Zero Waste BC</i></p>	Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
<p>4. 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 Interchange material comes in, but they</p>	<p>1</p> <p><i>Columbia Shuswap Regional District</i></p>		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)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
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 CSR D gets for managing the Interchange 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.			
5. The CSR D is appreciative of the capital funding support received from Interchange to establish the hazardous waste depots at the CSR D's landfill facilities. However, Interchange 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 CSR D's hazardous waste depots becoming significant receiving facilities in our communities. As such, the funding model needs to be revisited.	1 <i>Columbia Shuswap Regional District</i>		Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.
6. 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.	1 <i>District of Squamish</i>	1 <i>Zero Waste BC</i>	Interchange monitors the system on an ongoing basis.

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
7. You mentioned that Interchange 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 Interchange 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 Interchange were responsible for managing its program materials and collection. It is in the interest of Interchange 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 Interchange 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.

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
<p>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 Interchange, and the cost ends up being covered by the RD. If built-in payments are not feasible, then Interchange should identify other operators/contractors in the region that can be called to collect containers and filters and pay them directly for their services.</p>	<p>1</p> <p><i>Cariboo 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>10. Would like a form to submit invoices for fees associated with the pickup of Interchange 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 Interchange for additional costs associated with picking up material in those odd cases.</p>	<p>1</p> <p><i>Comox Valley 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>Program Marketing & Consumer Awareness Comments below are from 3 unique Local Governments, 1 unique Service Provider/Other</p>			
<p>1. Are there any specific strategies for communications?</p>	<p>1</p> <p><i>Regional District of</i></p>		<p>Yes, Interchange 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,</p>

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
	<i>Fraser-Fort George</i>		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.
<p>2. For a program operating as long as Interchange 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 Interchange 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.</p>	<p>1</p> <p><i>District of Squamish</i></p>	<p>1</p> <p><i>Zero Waste BC</i></p>	<p>Most British Columbians take their vehicles to be serviced at a licensed mechanic or lube shop and are therefore recycling Interchange 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.</p>
<p>3. Interchange 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</p>	<p>1</p> <p><i>District of Squamish</i></p>	<p>1</p> <p><i>Zero Waste BC</i></p>	<p>Thank you for your feedback. Your comment is noted and will be taken into consideration as part of program delivery.</p>

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
regard to languages and ensure the materials are produced in the suite of languages needed to reach multiple demographics.			
<p>4. For all products collected, we encourage Interchange 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 BCOUMA program. Putting the Interchange 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.</p> <p>Interchange 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.</p>	<p>1</p> <p><i>District of Squamish</i></p>	<p>1</p> <p>(similar)</p> <p><i>Zero Waste BC</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>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.</p>	<p>1</p> <p><i>Columbia Shuswap Regional District</i></p>		<p>Over the past two years Interchange has increased its advertising efforts in the Interior and has seen the awareness numbers in those areas increase as a result.</p>
<p>Performance Measures & Targets Comments below are from 2 unique Local Governments, 1 unique Service Provider/Other</p>			
<p>1. Section 10 Performance Measures and Targets - These performance measures, targets and reporting commitments</p>		<p>1</p> <p><i>Zero Waste BC</i></p>	<p>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</p>

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
should be included in the plan so that a permanent written record can be established.			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 significant program changes). This responds to the new 'evergreen plan' approach requested by the Ministry.
2. Accessibility - 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.	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.
3. Sales, Collection and Capture Rates - 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).	1 <i>District of Squamish</i>	1 <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.
4. Consumer Awareness & Education - 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	1 <i>District of Squamish</i>	1 <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

Comments (by Plan Topic)	Comment Source(s)		Interchange Responses / Actions
	# Local Government	# Service Provider/Other	
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 Interchange about what works and where gaps exist, but this section does not show what would qualify as a correct answer.			oil, antifreeze or filters know what to do with the product and responsibly recycle it.
5. Product Management - The definitions and corrections for the levels of the hierarchy should be made and the Interchange definitions should not be used.	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.
6. Audits - More information should be audited where possible.	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.
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.		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.
8. I was wondering about the comment that RCF hours of operation are being added?	1 <i>Cariboo Regional District</i>		The Ministry asked Interchange to include the information with its annual reporting. It is already included on the Interchange 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 Interchange 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 Interchange 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 Interchange hybrid program. It is not clear how Interchange 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)*

(Interchange: Specific to containers, all automotive containers were subsequently added to this Plan at the request of the Ministry.)

- We would like to see Interchange handle empty oil containers over 30L as well as other forms of lubricating oil. *(District of Squamish)*
(Interchange: Specific to containers, all automotive containers were subsequently added to this Plan at the request of the Ministry.)

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 Interchange 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)*
(Interchange: We are working on this and have a 1-2 year timeline to achieve this with an e-claim system.)
- Automatic payments from Interchange 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 Interchange at any time during the year, not only at specific times. *(Cariboo Regional District)*
(Interchange: 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)*
(Interchange: 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.)

B2. Consultations on Automotive Container Expansion

Consultation Process

Interchange held stakeholder consultations on a proposed change to its current EPR Plan, as approved by the Ministry of Environment and Climate Change Strategy (Ministry) on February 18, 2021 and revised in December 2021.

The change would expand the eligible containers under Interchange’s program to include all automotive containers (Table 1 below, and as further defined in a draft [EPR Plan](#) prepared specifically for the container consultation). The change was prompted by comments received through Interchange’s annual stakeholder survey. Interchange has proposed to begin collecting all automotive containers within 8 months of the EPR Plan approval.

Table 1. Automotive Containers

Containers under Current Plan	Proposed Additions
<ul style="list-style-type: none"> • Lubricating oils • Antifreeze 	<ul style="list-style-type: none"> • Diesel exhaust fluid (DEF) • Automotive additives • Windshield washer fluid (WWF) • Aerosols • Drums (up to 210L) • Others

In preparation for open consultations on including all automotive containers, Interchange engaged in the following due diligence initiatives to inform its change request to the Ministry.

- In 2021, Interchange received feedback through its Operators Survey, noting the following observations by its Registered Collection Facilities (RCFs):
 - Many containers are received that cannot be recycled with our normal plastics.
 - A better process is needed to handle new products not in the program, such as the plastic drums which are going into the landfill.
 - There needs to be less staff time dealing with incorrect drop offs and abuse.
- In 2021, Interchange completed a study of potential modifications to the current scope of program containers.

Results: The general conclusion was that a container expansion would reduce the resources required by collection facilities to sort the included containers from those that are currently excluded.

- In 2020, Interchange participated with other Canadian used oil management associations (UOMA) in a life-cycle study (production-use-reuse/recycling) of lubricating oil and antifreeze containers, with a focus on single-use plastics.

Results: One of the detailed findings was that a large number of plastic bottles and jugs—such as those for appearance products, additives, and windshield washer fluid—end up in the hands of recyclers who cannot justify the cost of processing them without incentives.

From January 18 to March 15, 2022, Interchange’s open consultation process was conducted. The process details were published on the Interchange website, meeting the BC Recycling Regulation’s requirement to solicit EPR Plan comments for a minimum of 45 days. Interested parties were invited to submit remarks in writing to Interchange by March 15, 2022 and were provided access to relevant materials to consider for their feedback. These materials included:

- [Overview of Program Changes—expanded container category](#)
- [Proposed EPR Plan](#)
- [Current Approved EPR Plan](#)
- [Interchange Study and Service Provider Engagement on Container Category Expansion](#)
- [National Survey and Study of the Lubricating Oil and Antifreeze Packaging Circular Economy](#)

Interchange also held two public webinars to provide highlights of the proposed Plan expansion and answer questions from attendees. The [Overview of Program Changes—expanded container category](#) as published on the Interchange website was presented at both sessions.

Session 1: Tuesday, February 22, 2022 at 10am PT

Attendees: 17 representatives of stakeholders that included auto dealerships, automotive product retailers, equipment suppliers and fluid heating services, as well as Product Care. A further 10 respondents registered but did not attend.

Session 2: Tuesday, March 1, 2022 at 10am PT

Attendees: 18 representatives of stakeholders that included local governments and environmental groups, as well as a major product manufacturer, the BC Product Stewardship Council (BCPSC) and Product Care. A further 3 respondents registered but did not attend.

Note that beyond the website posting, on January 26, 2022, Interchange also directly sent notice of these open consultations to the Recycling Council of BC (RCBC) and Coast Waste Management Association (CWMA), inviting both their members and those in their networks to participate in the process. Both organizations broadly communicated on the consultations in the impending issue of their respective newsletters.

Consultation Feedback and Interchange Responses

Table 2 below presents the consultation feedback on the automotive container expansion received through the open consultation process, together with Interchange’s responses where applicable. Note that lengthy comments have been summarized without the intent of distorting the original messaging. For transparency, the full text of all written responses is included in section B4 of this appendix followed by a listing of all consultation session participants.

Themes in the comments received include:

- General support for the expansion by 4 respondents; not supported by 2 respondents
- Have concerns this would result in some duplication in product coverage across programs
- Will have to address potential confusion by users/collectors on directing the expanded products into the correct program
- Need assurance that producers will pay the full costs of the container expansion
- Need further details in some areas to make a fully-informed assessment of this change:
 - overall cost to the program
 - approach to appropriate collector compensation
 - extra collection space/staffing considerations
 - any changes to the haulers required, or the hauling frequency
 - potential for collectors to opt-out on products
 - approach to managing the residuals resulting from a container expansion

Interchange acknowledges some comments that were not directly relevant to the container expansion. A summary of these [Other Comments](#), some of which were ultimately responded to in the subsequent comprehensive EPR Plan consultations (section B1 above), is included below Table 2.

Table 2. Consultation Feedback

Comments / Questions		Interchange Responses / Actions
1. BC Bottle and Recycling Depot Associations (BCBRDA)		
<p>Support expansion? Yes</p> <p><i>Related comments:</i></p> <ul style="list-style-type: none"> – I would first like to congratulate you on your initiative to bring additional automotive containers into the system. Your move to 	<p><i>Other relevant comments:</i></p> <ul style="list-style-type: none"> – Members believe Interchange has not met its regulatory requirements for the consultation: <ul style="list-style-type: none"> • stakeholder involvement in <u>design stage</u> of consultation plan, • ability for stakeholders to determine the implications to their interests by reading the wording in 	

Comments / Questions		Interchange Responses / Actions
<p>collect and recycle these containers in support of a circular economy and with the growing number of vehicles on Canada's roads is encouraging, and we support it.</p>	<p>a document that is the subject of the consultation, and</p> <ul style="list-style-type: none"> • stakeholders receiving transparent and detailed information, including the <u>methodology</u> used to determine costs. <ul style="list-style-type: none"> – Also missing is assurance that producers will pay the full costs of managing their materials. – Ensure our members are compensated fairly for the services they provide. 	
<p>2. Canadian Vehicle Manufacturers Association (CVMA)</p>		
<p>Support expansion? No</p> <p><i>Related comments:</i></p> <ul style="list-style-type: none"> – WWFs are already included under Blue Box program so there is potential for duplication of effort and costs/EHCs. – Similarly, aerosols are already included under Product Care so also has potential for duplication along with contamination from non-automotive aerosols. 	<p><i>Other relevant comments:</i></p> <ul style="list-style-type: none"> – Insufficient information provided on cost implications for the program as a whole. – For container contamination in commercial settings (WWFs, DEFs), Interchange should be able to resolve issues through education and more fastidious collection. – Clarify what the “other” containers category includes. 	<p>Automotive containers in the residential curbside program have been identified as causing contamination and other environmental issues. Interchange will work with the residential curbside program in BC and Product Care to collectively ensure that consumers are aware of their collection access options, the management of automotive containers is accurately reported and the economies of scale and collection efficiency is fully explored. The “Other” larger ICI containers such as drums are not included in this proposed amendment.</p>
<p>3. District of Squamish</p>		
<p>Support expansion? Yes</p> <p><i>Related comments:</i></p> <ul style="list-style-type: none"> – We commend Interchange on committing to 	<p><i>Other relevant comments:</i></p> <ul style="list-style-type: none"> – There is no mention of how the residuals in the extended suite of program products will be handled nor if any of their containers will be handled any differently than the existing ones. 	

Comments / Questions		Interchange Responses / Actions
expanding the products it will include in the program.	<ul style="list-style-type: none"> We would like to see Interchange partner 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. 	
4. Metro Vancouver		
<p>Support expansion? Yes* (*interpreted from response)</p> <p><i>Related comments:</i></p> <ul style="list-style-type: none"> Simplifies recycling process for consumers of automotive related product containers and keeps them out of the garbage. Increases exposure of Interchange program as more product types are accepted. Potentially reduces contamination in other EPR programs, such as Recycle BC, Product Care. 	<p><i>Other relevant comments:</i></p> <ul style="list-style-type: none"> How will Interchange avoid potential confusion for consumers/staff at the collection facilities in matching materials to the proper program? Consider training/resource needs. Additional staff and space may be required at collection sites, particularly to accept 210L drums. Will collectors be able to opt out of collecting selected containers? What will the hauling frequency be to address potential space concerns? How will Interchange ensure producers are paying the cost of managing and accepting the expanded containers? What is the plan to help collectors manage residuals in containers, including secondary containment and leaky containers? Will there be one hauler for all Interchange containers or will depots need to source additional haulers? 	<p>Automotive containers in the residential curbside program have been identified as causing contamination and other environmental issues. Interchange will work with the residential curbside program in BC and Product Care to collectively ensure that consumers are aware of their collection access options, the management of automotive containers is accurately reported and the economies of scale and collection efficiency is fully explored. The “Other” larger ICI containers such as drums are not included in this proposed amendment.</p>
5. Regional District of Nanaimo		
<p>Support expansion? Yes* (*interpreted from response)</p> <p><i>Related comments:</i></p>	<p><i>Other relevant comments:</i></p> <ul style="list-style-type: none"> Only concern is the continuing absence of some fluids from the collection program, esp. brake and power steering fluids. BCOUMA says these materials are intended to be 	

Comments / Questions		Interchange Responses / Actions
<ul style="list-style-type: none"> - n/a 	<p>used in their entirety and only residuals should remain. This does not address:</p> <ul style="list-style-type: none"> a) waste fluids that were drained from the automobile, or b) expired and partially used containers. <p>Collectors do receive small volumes of these materials but get reduced rates for lubricating oil contaminated with non-lubricating hydraulic fluids. There are many benefits to customers /collectors/environment of collecting these fluids.</p>	
<p>6. Recycle BC</p>		
<p>Support expansion? No*</p> <p>(*but taking no position on non-residential products – see ‘other relevant comments’)</p> <p><i>Related comments:</i></p> <ul style="list-style-type: none"> - Recycle BC manages some products identified by Interchange. If these products are purchased by a BC resident, producers currently pay fees to Recycle BC to ensure their responsible management. - Residents benefit from the convenience of placing most of these containers in their curbside recycling, plus 	<p><i>Other relevant comments:</i></p> <ul style="list-style-type: none"> - Recycle BC understands Interchange is primarily interested in collecting non-residential, institutional, commercial, or industrial products which are not used by residential consumers. Recycle BC takes no position on these non-residential materials as they are not covered by Schedule 5 of the Recycling Regulation/our Stewardship Plan. - However, Recycle BC does not believe it is appropriate for Interchange to target products that already have a convenient/effective collection system. 	<p>Automotive containers in the residential curbside program have been identified as causing contamination and other environmental issues. Recycling Regulation Schedule 5 automotive containers are showing up in the Interchange collection system causing contamination and additional costs. Interchange will work with the residential curbside program in BC and Product Care to collectively ensure that consumers are aware of their collection access options, the management of automotive containers is accurately reported and the economies of scale and collection efficiency is fully explored.</p>

Comments / Questions		Interchange Responses / Actions
Recycle BC has ~230 depots across the province that collect our materials.		

Other Comments

In summary, comments received that were not directly relevant to the container expansion include:

- That the Plan amendment should include updates on several deliverables identified in Interchange’s existing Plan (e.g., the multiple studies undertaken).
- That variable handling fees should be developed to encourage environmentally desirable containers, and that producers should be penalized for using hard to recycle materials.
- That producers should be encouraged to include EPR labelling and recycling information on containers to clarify the correct disposal procedure.
- That Interchange should look at innovative ways to encourage new depots/collection points.
- That Interchange should share more broadly the Community Collection Event program.
- That the data on collected volumes/units should be available to local governments.
- That Interchange should work with producers and large volume consumers to reduce the number of containers to be recycled (e.g., refill options, larger bulk containers).
- That Interchange should aim for collection of 90% for all streams, and 95% for used oil.
- That the Zero Waste Hierarchy should be used to develop systems for the products to be redesigned, reduced, reused and recycled.
- That Interchange should engage in more annual waste audits and coordinate with other stewardship agencies (e.g., SABC) involved in local government waste audits.
- That BUCOMA and similar programs should work together to produce multi-EPR communication materials and have harmonized communication programs if customers are the same.
- That Interchange should set an ambitious goal to increase consumer awareness to 95% by the next Plan renewal.
- That communication materials should be available in languages other than French and English.
- That Interchange should regularly provide local governments and regional districts with updated lists of acceptable materials/depots so they can update their communication materials.

B3. Comprehensive EPR Plan: (a) Full Written Comments / (b) Session Attendees**(a) Full Written Comments**

Cariboo Regional District
District of Squamish
Zero Waste BC
Columbia Shuswap Regional District
Nanaimo Recycling Exchange
Thomson-Nicola Regional District
Peace River Regional District
Comox Valley Regional District
Pender Island Recycling

Note: All other feedback recorded in the EPR Consultation Summary in section B1 is based on notes taken by Interchange staff at the in-person and virtual consultation sessions.

From: Tera Grady <TGrady@cariboord.ca>
Date: November 1, 2022 at 3:14:03 PM PDT
To: David Lawes <DLawes@usedoilrecycling.ca>
Cc: "Will Burrows (wburrows@usedoilrecycling.ca)" <wburrows@usedoilrecycling.ca>
Subject: EPR Plan Consultation- Cariboo RD Comments

Hi David, see below:

- It's nice to see that there is one member of the public and one local government representative on the BCUOMA Board; however, a broader representation from environmental NGO's, First Nations and additional local governments would better reflect the full range of stakeholders. Alternately BCUOMA could form an advisory committee consisting of these types of members that would report to the BCUOMA Board.
- BCUOMA producers who are responsible for the oil filters that can not 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.
- 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?
- Producer paying the cost:
 - - 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 Regional District.
 - 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.
 - 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.

Tera D. Grady, BSc, RPF
Supervisor of Solid Waste Management
tgrady@cariboord.ca

Cariboo Regional District
Suite D, 180 North 3rd Avenue
Williams Lake, BC V2G 2A4
Phone: 250-392-3351 Ext 218
Cell: 250-305-7688
Fax: 250-392-2812
<http://www.cariboord.ca>



To Whom It May Concern,

Thank you for the opportunity to comment on the draft plan. The District of Squamish is committed to a Zero Waste future and acknowledges that climate change is happening, and local governments play an important role in reducing greenhouse gas emission. The need to respond to climate change is urgent and achieving zero waste through diversion and waste reduction is a key component. Zero waste is the conservation of all resources by means of responsible production, consumption, reduction, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health. Our current resource consumption systems not only create waste but also generate a huge amount of greenhouse gases which constitute some of the discharges that threaten the environment and human health. EPR programs can play a key role in changing these consumption systems.

We recognize that BC is a global leader in EPR programs, and that the Province, through the Recycling Regulation, has supported their growth and development. Since their inception, the EPR programs have evolved, they are utilized extensively within our community and they are integrated into waste diversion programs/systems throughout the province. That being said, it is up to the Province to ensure that these Programs, BCUOMA included, are continually moving the dial to ensure they move beyond business as usual, which includes the following actions (but isn't limited to these) and the related targets (or the development of):

- Increase collection rates,
- Increase customer and industry awareness of all accepted products,
- Increase their support of the top tiers of the pollution prevention hierarchy, such as reduction.

Please see our comments by section below:

Sections 2 & 3 – Overview and Legal Requirements

We commend BCUOMA on committing to expanding the products it will include in the program. We recommend BCUOMA clarify that it handles the residual material left in accepted containers, in addition to the residual oil. As well, we would like to see BCUOMA handle empty oil containers over 30 L as well as other forms of lubricating oil.

Section 4 – Governance and Financing

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.

BCUOMA should further develop variable handling fees to encourage longer lasting, reusable or refillable containers, as well as the use of easy-to-recycle materials and PCR content in the packaging, to drive product producers to design change. BCUOMA should penalize producers for using non, or hard to, recycle materials, such as PVC pouches, or material that is burned for energy.

The programs should try to phase out the ironically named 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. It should be a key aspect of this renewed program. BCUOMA is commended for conducting a study into how the circular economy could be relevant to these products.

Section 4 – Product Design and Use Trends

For all products collected, the District of Squamish encourages 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.

Section 5 – Product Available for Collection

Lubricating Oil -the study on consumption on 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.

Oil Filters -The program should work to minimize the non-recyclable components of oil filters so that waste to energy is no longer used.

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.

Section 6 – Collection

We believe BCUOMA has been leading the way in finding innovative solutions for collection, that acknowledges not every collection site looks or runs the same. We also appreciate and value the work BCUOMA has been doing with indigenous groups around the province.

It is also 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 Nation’s 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. We encourage BCUOMA to look at new and innovative ways to encourage new depot and collection points in communities, including in Squamish. Additionally, the service levels seem quite broad, with one collection site per 100,000, this does not seem in-line with accessibility nor equity goals.

Collection sites often struggle with managing the large volumes of material received through this and other EPR programs. The loss of Canadian Tire as a collection site (several years ago) was notable in our community. Squamish now has one official BCUOMA collection site, and 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.

We would like to see BCUOMA partner 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. 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. While both EPR programs guaranteeing that the products will still be recycled responsibly.

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. The population with access to collection should have a target of 100%, with all municipalities served as well as any First Nations locations as determined in conjunction with the First Nations. Mail-back or pick-up options should be available for those not living in the aforementioned locations. The commitments to work with RDs and IZWTAG are good steps.

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.

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 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.

We appreciate that BCUOMA is offering grants for infrastructure and think that the program should be paying 100% of the programs-specific costs. Events should be used as marketing tools to raise awareness rather than counted as part of accessibility as people are unlikely to store the materials until an event (often irregularly and sporadically timed) may occur.

Section 6 – Transportation and Processing

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.

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.

7.3 This section 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.

The Zero Waste Hierarchy should be used to develop systems for the products to be redesigned, reduced, reused and recycled. 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. More filters should be shifted to recyclable types and containers, when not reusable, be recyclable. There is no mention of how the residuals in the extended suite of program products will be handled nor if any of their containers will be handled any differently than the existing ones.

7.5 Landfill Audits: BCUOMA should pay into more annual waste audits and coordinate with other stewardship agencies (usually through SABC) involved in local government waste audits. This should be equally spread across the province, not just focused on Metro Vancouver. SABC is currently only committing to two audits per calendar year, this is not adequate as local governments are the ultimate site/handler for BCUOMA's product that goes into the garbage and there should be a detailed awareness of how much of the regulated product ends up in that stream. 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. 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.

Section 8 – Paying the Cost of Collection & Management

This is 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 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.

The plan also notes 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. The District of Squamish is one of such examples, and while it has been requested, the volume of work required by BCUOMA to set-up the program has posed an obstacle to becoming an official collection site.

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.

Section 9 – Program Marketing and Consumer Awareness

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. This is an opportunity for BCUOMA to improve their marketing.

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 (ex. 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.

We would like to see BCUOMA communication materials in languages other than French and English. The District of Squamish would like to see materials produced in Punjabi and Tagalog, in particular BCUOMA should provide local governments and regional districts updated lists of acceptable material and depot on a regular basis so they can update their own communication materials and ensure consistent and correct information.

Section 10 – Performance Measures & Targets

These performance measures, targets and reporting commitments should be included in the plan so that a permanent written record can be established.

- I. **Accessibility**
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.
- II. **Sales, Collection and Capture Rates**
As noted, the criteria for what counts as available for collection should be defined by the MOECCS 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).

III. Consumer Awareness & Education

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.

IV. Product Management

As noted before, the definitions and corrections for the levels of the hierarchy should be made and the BCUOMA definitions should not be used.

V. Audits

More information should be audited where possible.

The District of Squamish appreciates the opportunity to provide feedback and would like to reiterate that this is an opportunity to reduce environmental impacts and the efforts and initiatives in this area should be strengthened, alongside the creation of related targets for reuse, repair and refurbishment.

We hope to see increasingly ambitious goals for BCUOMA to further awareness and collection to ensure continued growth of the program.

Sincerely,

Shannon White

Integrated Solid Waste Specialist



October 31, 2022

BCUOMA Draft Program Plan Feedback**To Whom It May Concern:**

Thank you for the opportunity to comment on the draft plan. Zero Waste BC is a non-profit association dedicated to driving systemic change towards Zero Waste in BC. Zero Waste is the conservation of all resources by means of responsible production, consumption, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health. Our current resource consumption systems of linear take-make-waste not only create waste but also generate a huge amount of greenhouse gases which constitute some of the discharges that threaten the environment and human health. EPR programs can play a key role in changing these consumption systems. For more information on Zero Waste, please see the Zero Waste Hierarchy.¹

We are pleased that BCUOMA will be submitting its plan which includes some improvements to its existing system. We submit these comments in hope that the program will show leadership in the realm of EPR to move it beyond mere recycling to actually changing the nature of the products and how the service is delivered, as envisioned in the Canadian Council of Ministers of Environment Canada-wide Action Plan for EPR.

Please see our comments by section below:

Section 3. Legal Requirements

We are pleased that the program covers all products defined in the *Recycling Regulation* but hope for completeness that the programs would also handle empty oil containers over 30 L as well as other forms of lubricating oil. Given that the last consultation in February 2022 was for containers to 210L, this is confusing. Also, the

Section 4. Governance and Financing

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.

In regards to financing, BCUOMA should further develop variable environmental handling fees based on certain criteria such as lifespan, use of refillables and reusable containers, use of easy

¹ Zero Waste Hierarchy: <https://zerowastecanada.ca/zero-waste-hierarchy/>.

to recycle materials (versus materials that are wasted by being burned for energy), etc. to drive product design change as intended by the Canadian Council of Ministers of Environment. The program could incentivize reusable containers and then those that are actually recyclable. The programs should try to phase out the ironically named 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. It should be a key aspect of this renewed program. UOMA is commended for conducting a study into how the circular economy could be relevant to these products.

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.

Section 5. Product Available for Collection

Lubricating Oil -the study on consumption on 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.

Oil Filters -The program should work to minimize the non-recyclable components of oil filters so that waste to energy is no longer used.

Containers - 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.

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.

Section 6. Collection

BCUOMA has been doing well in improving its public collection sites and increasing the compensation. It has been also 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 Nation’s 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.

The program should work with the BC Product Stewardship Council and the Indigenous Zero Waste Technical Advisory Group to determine the underserved communities.

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 guaranteeing 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.

The program may also 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.² 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.

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 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).

We appreciate that BCUOMA is offering grants for infrastructure and think that the program should be paying 100% of the programs-specific costs. Events should be used as marketing tools to raise awareness rather than counted as part of accessibility as people are unlikely to store the materials until an event (often irregularly and sporadically timed) may occur.

Section 7 Transportation and Processing

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.

² BC Ministry of Environment and Climate Change Strategy (2018). Consumer Awareness Survey of Extended Producer Responsibility Programs in BC. Accessed at https://www2.gov.bc.ca/assets/gov/environment/waste-management/recycling/recycle/rel-res/consumer_awareness_survey_of_epr_2017.pdf.

7.3 This section 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.

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 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 MOECCS 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.

7.5 Landfill Audits

The use of waste composition audits going forward is useful to see if the containers and filters are being 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.

Section 8 Paying the Cost of Collection and Management

This is 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

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.

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.

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.

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.

[Section 9 Program Marketing and Consumer Awareness](#)

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. The program could also 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.

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

demographics of BC with regard to languages and ensure the materials are produced in the suite of languages needed to reach multiple demographics.

BCUOMA members should label their products so consumers know where to take them.

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.

- I. **Accessibility**
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.
- II. **Sales, Collection and Capture Rates**
As noted, the criteria for what counts as available for collection should be defined by the MOECCS 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).
- III. **Consumer Awareness & Education**
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.
- IV. **Product Management**
As noted before, the definitions and corrections for the levels of the hierarchy should be made and the BCUOMA definitions should not be used.
- V. **Audits**
More information should be audited where possible.

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.

In conclusion

The program plan has a good basis but needs stronger targets and more ambition in achieving the outcomes intended by the CCME Canada-wide Action Plan for EPR. Some of the more

ambitious direction could include more fully addressing some of the suggestions from the consultation for the previous plan. Another area that could be examined is the issue of the products entering the marine environment and oil containers used for boats ending up as shoreline litter. This plan renewal, at a time when BC is planning to develop a Circular Economy Strategy, is an opportunity to reduce environmental impacts and the efforts and initiatives in this area should be strengthened, alongside the creation of related targets for reuse, repair and refurbishment. That said, we look forward to continued improvement of this program.

Sincerely,
Sue Maxwell
On behalf of Zero Waste BC

Columbia Shuswap Regional District response to Draft Extended Producer Responsibility Plan BCUOMA

October 2022

6.2 Consumer Collection

- Currently in the BC interior there is only one registered collector (GFL) 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.

7.5 Landfill Audits

- More participation from all the stewardship organizations when it comes to audits would be appreciated. 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?

8 Paying the Cost of Collection and Management

- 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 apart 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.
- 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 i.e. 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.

9 Program Marketing and Consumer Awareness

- 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. Have more education at the retail locations would be beneficial.

Columbia Shuswap Regional District response to Draft Extended Producer Responsibility Plan BCUOMA

Additional comments:

- 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.
- 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.



Do not go where the path may lead - go instead where there is no path and leave a trail.

Nanaimo Recycling Exchange Feedback to BCUOMA Draft EPR Plan, 2022

General response to BCUOMA DRAFT plan and reports.

Increased transparency and understanding of the BCUOMA program would be achieved through MOECC determined format for EPR plans and reports, with strict oversight of terms and evidence.

BCUOMA is one of the most confusing EPR programs to understand. It is not clear how EPR actually helps to lower environmental damage and impact of products when it appears that 96% of products collected are outside the EPR purview, and 4% seems to be within program control. How is it beneficial to have an EPR program to manage 4% of products accepted?

It is almost impossible to determine the relationship between BCUOMA and the commercial collection system. If EHC's 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"?

The BC Used Oil Management Association EPR Plan DRAFT highlights the need for updated MOECC 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.

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 ~~has~~ out-paced value of materials for traditional recycling and has thereby replaced the traditional use of the word Recycling.

Environmental Management Act. Definitions 1. (1)

"recyclable material" means a product or substance that has been diverted from disposal, and satisfies at least one of the following criteria:

(a) is organic material from residential, commercial or institutional sources and is capable of being composted, or is being composted, at a site;



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(b) is managed as a marketable commodity with an established market by the owner or operator of a site;

(c) is being used in the manufacture of a new product that has an established market or is being processed as an intermediate stage of an existing manufacturing process;

(d) has been identified as a recyclable material in a waste management plan;

(e) is any other material prescribed by the Lieutenant Governor in Council, or the minister under section 22 [minister's regulations — codes of practice];

MOECC 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.

MOECC 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.

In fact, MOECC 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.

Collection

Typically, EPR programs demonstrate successful collection. Annual reports are meant to show year over year improvement in management of products. BCUOMA's "Unaccounted For" products have been troublesome since 2006 reports, and not much seems to have changed.

The BCUOMA "Stewardship" model is unique at best and entirely misleading at worst. As noted in the proposed plan, "the processors own the material they collect or receive from collectors and market this material for their own benefit. 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" product is being achieved.

Instead, the enhanced definition of "Unaccounted for" has become "Re-Purposed" which sounds like one of those great "Re" words like recycle, or refurbish, or reuse. Except it's not. 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 actually recycling. This not just the result of loose definitions: it also happens any time oil prices drop and remove the reason to purchase



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recycled oil. EPR is meant to cushion these market fluctuations with incentives, but BCUOMA has no EPR control over 96% of product and so doesn't provide incentives.

Recycling

How is it that consumers have to wash salad dressing out of a plastic bottle, but used motor oil containers contaminated with oil can be recycled? As it turns out, DesRosiers reports they aren't being recycled. There is troubling discrepancy between BCUOMA reporting and the DesRosiers findings:

BCUOMA Plan states,

- "while plastic oil and antifreeze containers are recycled into new oil containers, drainage tiles, and parking curbs," and
- "both used antifreeze and empty containers are processed and recycled at facilities right here in British Columbia."

The DesRosiers study reports, "

- Smaller package types such as bottles and jugs are intentionally made of HDPE with recyclability in mind but the issue of contaminants is a source of concern which reduces the recyclability and rate of reuse for these plastics
- Package manufacturers noted that their decision to use new plastic versus recycled plastic is generally cost driven with new plastic currently noted as the more economically viable option
- Do automotive fluid container manufacturers also purchase this recycled material? Participants in this study noted that the majority—if not all—of their recycled (reduced to resin, pellets, flaked) material is sold to other industries.
- Recyclers—according to package manufacturers—are deeply concerned with the amount of oil residue left within these HDPE containers once they reach their facilities. This contamination can make it impractical to recycle the plastic and can also negatively affect the quality of the recycled resin.
- However, as recyclable as HDPE plastic is on its own, the issue of contaminants presents a frequent speedbump
- As was mentioned by a number of recyclers, the current price of recycled resin sits somewhat higher than virgin resin, or at least they are similar in price. Package manufacturers make price-driven decisions when it comes to selecting a supplier for their plastic and a more expensive recycled product does not make for a good purchase.

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 the unfortunate "eco-boxes" out of the market. EPR fees should be used to incentivize Reuse containers. The barrier is not that producers are out of country. The barrier is BCUOMA failure to implement a fee schedule to change packaging design.



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Can we stop enabling the bending and twisting of definitions to pretend PRO's are managing products for their highest and best use, which everyone seems to believe is recycling. It is completely unfair to PRO's to expect magical recycling of non-recyclable products. Further research will not make a product recyclable, and it's a waste of eco-fee revenue. Why do we insist on perpetuating this faux EPR model when EPR was designed to remove polluting products from the system?

The suggestion by DesRosiers to develop an industry board to standardize packaging types and set recycling fees and incentives is disturbing: if an EPR provider is not able to implement EPR principles, then again, what is the benefit of EPR for these products?

In the DesRosier report, the Recycling industry is clear about refusing to recycle many containers without incentives. Whether this is a hostage tactic or a reflection of the truth about plastic, it's a lost cause. Contamination and competition from within the plastic industry will prevent achievement of recycling goals of BCUOMA plastic containers and other products.

Kind Regards,

Jan Hastings, MA
Executive Director
Nanaimo Recycling Exchange
jan@recycling.bc.ca

Thomson-Nicola RD (Survey Comments)

EPR Plan Consultation Survey - Fall 2022

Q6

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

8. Paying the Cost of Collection and Management

The TNRD is confident that the Return Collection Facility 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 Return Collection Facilities are receiving adequate service levels.

Currently, Registered Collectors are offering adequate service levels if the Return Collection Facility pays an hourly rate for the equipment used to service the Facilities. Or, alternatively if the Return Collection Facility 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 Return Collection Facilities. This is does not appear to be the case in the Interior of BC.

Q8

Do you have any further comments on the draft Plan?

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.

Peace River RD (Survey Comments)

Q8

Do you have any further comments on the draft Plan?

Can't wait to see what kind of facilities we can get rolling with the PRRD

Comox Valley RD (Survey Comments)

Q6

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

As discussed via email 2021.02.23, a form to submit invoices for fees associated with the pickup of BCUOMA related products, and perhaps consider stipulation 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.

Q8

Do you have any further comments on the draft Plan?

We really appreciate the grant program, it makes our site safer!

Pender Island Recycling (Survey Comments)

Q6

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

A few small changes that would be welcome:

- please provide collectors with a better bung wrench that is made of metal, as the plastic one does not work
- a better "full" gauge, again the plastic one doesn't work
- a deposit on empty oil containers, they are messy to handle and take up a lot of space

Q8

Do you have any further comments on the draft Plan?

It's a great plan and our experience as a collector has been very positive. Thanks!

(b) Session Attendees (EPR Plan)

	Full Name	Organization Representing	EVENT- 2022
1	Katrina Forrest	BC Ministry of Environment & Climate Change Strategy	Virtual #1 - September 28
2	Michael Wadeson	BC Ministry of Environment & Climate Change Strategy	Virtual #1 - September 28
3	Laura Zapotichny	Regional District of Fraser Fort George	Virtual #1 - September 28
4	Mannie Cheung	Product Care Association	Virtual #1 - September 28
5	Josie Abate	Volkswagen Group Canada Inc	Virtual #1 - September 28
6	Scott Boulton	Ford Motor Company	Virtual #1 - September 28
7	Wayne	N/A	Virtual #1 - September 28
8	Rob Au	BC Ministry of Environment & Climate Change Strategy	Virtual #2 - October 4
9	Michael Wadeson	BC Ministry of Environment & Climate Change Strategy	Virtual #2 - October 4
10	Leanne Koehn	Ridge Meadows Recycling Society	Virtual #2 - October 4
11	Tai Uhlmann	Let's Talk Trash	Virtual #2 - October 4
12	Subrena Vieglais	Yamaha Motor Canada	Virtual #2 - October 4
13	Fiona	NA	Virtual #2 - October 4
14	Mario Anda	Product Care	Virtual #2 - October 4
15	Adriana Mailloux	Thompson-Nicola Regional District	Virtual #2 - October 4
16	Ilse Sarady	Cowichan Valley Regional District	Virtual #2 - October 4
17	Tammy Giroux	General Motors of Canada	Virtual #2 - October 4
18	Alda Nicmans	BCPSC	BCPSC Session - Oct 18
19	Adriana Mailloux	Thompson Nicola Regional District	BCPSC Session - Oct 18

	Full Name	Organization Representing	EVENT- 2022
20	Andrea Patrao	Sunshine Coast Regional District	BCPSC Session - Oct 18
21	Avril Gilmour Ford	Capital Regional District	BCPSC Session - Oct 18
22	Carolynn Lane	Fraser Valley Regional District	BCPSC Session - Oct 18
23	Cynthia Coates	Central Okanagan Regional District	BCPSC Session - Oct 18
24	Gayle Short	East Kootenay Regional District	BCPSC Session - Oct 18
25	Graham Casselman	Columbia Shuswap Regional District	BCPSC Session - Oct 18
26	Graham Thornton	Regional District of Fraser Fort George	BCPSC Session - Oct 18
27	Ingalisa Burns	qathet Regional District	BCPSC Session - Oct 18
28	Janette Derksen	Regional District of Bulkley-Nechako	BCPSC Session - Oct 18
29	John Gillis	Peace River Regional District	BCPSC Session - Oct 18
30	Kieran Griffith	Kitimat Stikine Regional District	BCPSC Session - Oct 18
31	Marie Lou Leblanc	Squamish-Lillooet Regional District	BCPSC Session - Oct 18
32	Martin Dickson	Thompson Nicola Regional District	BCPSC Session - Oct 18
33	Sarah Willie	Comox Valley Regional District	BCPSC Session - Oct 18
34	Tera Grady	Cariboo Regional District	BCPSC Session - Oct 18
35	Travis Barrington	Regional District of Central Kootenay	BCPSC Session - Oct 18
36	Vanessa Lafontaine	Squamish-Lillooet Regional District	BCPSC Session - Oct 18
37	Andrew Doi	Metro Vancouver	CWMA - October 26
38	Paul Henderson	Metro Vancouver	CWMA - October 26
39	Michael Wadeson	BC Ministry of Environment & Climate Change Strategy	CWMA - October 26

	Full Name	Organization Representing	EVENT- 2022
40	Shauna Black	BC Ministry of Environment & Climate Change Strategy	CWMA - October 26
41	Bill Paton	MARR	CWMA - October 26
42	Mario Anda	Product Care Recycling	CWMA - October 26
43	Jeff McCord	Nickel Bros	CWMA - October 26

B4. Automotive Container Expansion: (a) Full Written Comments / (b) Session Attendees**(a) Full Written Comments**

BC Bottle & Recycling Depot Association
Canadian Vehicle Manufacturers' Association
District of Squamish
Metro Vancouver
Regional District of Nanaimo
Recycle BC



33030 . 11198 - 84 Avenue . Delta. British Columbia . V4C 8E6

March 15, 2022

Mr. David Lawes
Executive Director, BC Used Oil Management Association
Suite 230, 830 Shamrock Street
Victoria, BC V8X 2V1

Re: BCUOMA Stewardship Plan – Expansion to Additional Automotive Containers

Dear Mr. Lawes,

Thank you for the opportunity to provide feedback on the BC Used Oil Management Association's (BCUOMA) proposed program changes and, through it, your proposed amendments to your current Extended Producer Responsibility (EPR) Plan.

On behalf of the BC Bottle and Recycling Depot Association (BCBRDA), I am writing to share some key feedback on behalf of those BCBRDA members who collect materials for BCUOMA. I hope you will consider our association's feedback and work with us to rectify concerns before submitting your EPR Plan amendments to the Ministry of Environment and Climate Change Strategy (MOECCS).

Before I share our association's feedback, I would first like to congratulate you on your initiative to bring additional automotive containers into the system. Your move to collect and recycle these containers in support of a circular economy and with the growing number of vehicles on Canada's roads is encouraging, and we support it.

This being said, we also want to ensure all regulatory obligations are met on the path to bring additional automotive containers into your program, including:

1. Your obligation to undertake satisfactory consultation, where "satisfactory" must reflect:
 - o stakeholder involvement in the design stage of the consultation plan,
 - o the ability for stakeholders to determine the implications to their interests by reading the wording in a document that is the subject of the consultation, and
 - o stakeholders receiving transparent and detailed information, including the methodology used to determine costs; and
2. Producers' obligation to pay the full cost of managing their materials.

Our members' concerns are that BCUOMA has not met its consultation requirements, nor is consultation contributing to the required assurances that producers will pay their full cost for the additional automotive containers. This is particularly critical when it is our members' experience that producers are not currently paying their full cost when it comes to managing existing materials.

According to the *Recycling Regulation* and [Recycling Regulation Guide](#), there is an overt relationship between PROs' consultation processes and their producers paying their full cost. The consultation process requires that stakeholders receive transparent, detailed documented information about the foci



33030 . 11198 - 84 Avenue . Delta. British Columbia . V4C 8E6

of the consultation process, and how they impact stakeholders. It also requires that the foci include the methodology used to determine producers' full cost.

For our members, consultation on the methodology used to determine producers' full cost for additional automotive materials is imperative. The methodology is the path to arrive at a valid, transparent, fair financial model that demonstrates producers are paying their full cost, including a fair return to service providers. The financial model then becomes the basis for which service providers, like us, are able to negotiate fair compensation.

As an association, we have been working with our individual members to learn about and understand their concerns. One of the concerns that we've heard is that BCUOMA is not paying contracted depots fair compensation for services provided. Our members note that current compensation does not account for key requirements to manage program materials, including rising labour costs, insurance costs, future environmental liabilities related to land clean ups and remediation, and more. As BCUOMA proposes to expand its program to include more materials, we want to ensure producers are held to account for their full costs – which will also go a long way to help ensure the long-term viability of depots as collection services providers.

To be clear, our members are interested in a long-term, mutually beneficial partnership with BCUOMA. Our goal with this letter is to work with you to:

1. Ensure the EPR Plan that goes to the MOECCS is meets all regulatory requirements.
2. Our members are compensated fairly for the services they provide.

To move forward in a timely and efficient manner, I am requesting a meeting in the next 10 business days, with the purpose to outline augmented consultation that fulfills BCUOMA's regulatory requirements. Please contact me at jay@interiorrecycling.com with three possible dates, including available times, for a meeting with our representatives. I will be happy to work with our Board representatives to coordinate an online discussion with BCUOMA. I look forward to our meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Aarsen".

Jay Aarsen
Board, Chair BCBRDA

cc:

Bob McDonald, MOECCS, Director, Extended Producer Responsibility
Will Burrows – BCUOMA, Director Consumer Collection & Sustainability



**Canadian Vehicle
Manufacturers' Association**
Association canadienne
des constructeurs de véhicules

222 Queen Street
Suite 1404
Ottawa, ON K1P 5V9

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

March 15, 2022

Mr. David Lawes
Chief Executive Director
BC Used Oil Management Association
3rd Floor, 536 Broughton Street
Victoria, BC V8W 1C6

Subject: BCUOMA 2022 Consultation – Expansion to Additional Automotive Containers

Dear Mr. Lawes:

The Canadian Vehicle Manufacturers' Association, representing Ford Motor Company of Canada, Limited, General Motors of Canada Company and Stellantis (FCA Canada Inc.), appreciates the opportunity to comment on BCUOMA's consultation on expanding the program to include additional automotive containers.

While we recognize that BCUOMA wishes to be proactive and add all automotive containers to its program to keep up with the changes to the province's recycling regulation related to plastics and the recently published, 5-year EPR plan, we believe further information and discussion is needed before all automotive containers are added to the program. Our comments and concerns are outlined below.

First and foremost, adding all containers to the program has the potential to increase costs for the stewards. The proposal as outlined does not provide sufficient information on the cost implications for the program as a whole.

For the list of automotive containers, we are concerned that windshield washer fluid (WWF) containers are proposed to be added to the program when they are already being collected under the blue box program in British Columbia. We do not support the inclusion of the WWF containers in the BCUOMA programs as there is no information or data to demonstrate the extent of the problem and what if any efforts have been taken to mitigate and prevent the collection of WWF containers so that it does not contaminate the current collection stream. As WWF containers are collected under the BC Blue Box program and stewards are already paying for these containers, adding this to the BCUOMA program has potential added costs. We are working under the presumption that the WWF containers contamination is found in commercial settings and feel that BCUOMA should be able to resolve this issue through education and more fastidious collection. Efforts need to continue and likely be increased, to ensure the participants avoid the collection of products that are outside of the program scope. We note that BCUOMA's publications do not highlight that other automotive fluid containers are not accepted (<https://bcusedoil.com/about-us/faqs/>). Section 5 indicates that 96% of material collected is from commercial locations where contamination should be non-existent with proper education and enforcement, leaving only 4% from public collection sites. Furthermore, it is also unclear if BCUOMA has engaged in a discussion with the blue box program to determine if there are opportunities to see if the containers can be placed into their program for management as it will ensure there is no duplication of effort. BCUOMA must not create a situation where one product is being collected and EHCs charged under two programs.

- 2 -

On the issue of DEF containers, we are again presuming that these containers are seen in the same settings as to where the contamination is found for WWF containers. Again, similar to our views on the WWF containers, BCUOMA as a first step, needs to undertake education to ensure that those involved are aware that DEF containers should not be placed with the used oil program containers. Should BCUOMA decide to move forward with including DEF containers, then a harmonized approach which is in place in other provinces (add names of provinces) needs to be taken. This will provide consistency and clarity to our members.

We do not support the proposed collection of automotive aerosol containers in the program as there is potential for additional overlap. We suggest that BCUOMA examine the other programs already in place where these containers are collected (13 programs across the country). In BC, aerosols are categorized as flammable solvents and are already being managed by Product Care. We also caution BCUOMA that the collection of these containers has the potential risk of increased contamination of non-automotive aerosol containers. For example, products that are automotive-like, such as general-purpose lubricating oils (WD-40, 3-in-1, or silicone sprays), cans of spray paint, penetrating oils, etc. may also be brought to the collection point.

Slide 5 of the consultation material lists "additional automotive containers", the last one is "other". BCUOMA should clarify what this includes.

CVMA is pleased to see that the revisions to the program plan have been shared with stewards and highlighting where the proposed program changes are being contemplated. It is helpful as it allows our members to understand the changes and provide meaningful input. From our review of the plan, we noted that several of the previously planned activities have not been undertaken or have not been completed. It would be beneficial for BCUOMA to provide an update on the plan and its deliverables before changes are made. For example, Section 4.1 indicates that a new "consumed in use study" was to be completed in 2019. It is unclear why the update is not included in the proposed plan revision and if the new percentage or formula was changed. Similarly, it is unclear what the progress is on the "unaccounted used oil" study in section 4.1, "lost antifreeze" study in section 4.2 and "oil filter light-weighting" study in section 4.3. and the change to 6.3 on the collection rate and why this is being changed.

We trust our comments will be considered. We would welcome the opportunity to meet with you to discuss our input before the program plan is finalized. We will contact you to arrange a meeting at a mutually convenient time.

Yours sincerely,



Yasmin Tarmohamed
Vice-President, Environment and Engineering



To Whom It May Concern,

Thank you for the opportunity to comment on the draft plan. The District of Squamish is committed to a Zero Waste future and acknowledges that climate change is happening, and local governments play an important role in reducing greenhouse gas emission. The need to respond to climate change is urgent and achieving zero waste through diversion and waste reduction is a key component. Zero waste is the conservation of all resources by means of responsible production, consumption, reduction, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health. Our current resource consumption systems not only create waste but also generate a huge amount of greenhouse gases which constitute some of the discharges that threaten the environment and human health. EPR programs can play a key role in changing these consumption systems.

We recognize that BC is a global leader in EPR programs, and that the Province, through the Recycling Regulation, has supported their growth and development. Since their inception, the EPR programs have evolved, they are utilized extensively within our community and they are integrated into waste diversion programs/systems throughout the province. That being said, it is up to the Province to ensure that these Programs, BCUOMA included, are continually moving the dial to ensure they move beyond business as usual, which includes the following actions (but isn't limited to these) and the related targets (or the development of):

- * Increase collection rates,
- * Increase customer and industry awareness of all accepted products,
- * Increase their support of the top tiers of the pollution prevention hierarchy, such as reduction.

Please see our comments by section below:

Sections 1 & 2 – Overview and Legal Requirements

We commend BCUOMA on committing to expanding the products it will include in the program. We recommend BCUOMA clarify that it handles the residual material left in accepted containers, in addition to the residual oil.

Section 3 – Governance and Financing

BCUOMA should develop variable handling fees to encourage longer lasting, reusable or refillable containers, as well as the use of easy-to-recycle materials and PCR content in the packaging, to drive product producers to design change. BCUOMA should penalize producers for using non, or hard to, recycle materials, such as PVC pouches.

Section 4 – Product Design and Use Trends

For all products collected, the District of Squamish encourages 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.

Section 5 – Collection

We encourage BCUOMA to look at new and innovative ways to encourage new depot and collection points in communities, including Squamish.

Collection sites often struggle with managing the large volumes of material received in this and other EPR programs. The loss of Canadian Tire as a collection site (several years ago) was notable in our community. Squamish now has one official BUCOMA collection site, however, 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.

We would like to see BCUOMA partner 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. 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. While both EPR programs guaranteeing that the products will still be recycled responsibly.

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. The population with access to collection should have a target of 100%, with all municipalities served as well as any First Nations locations as determined in conjunction with the First Nations. Mail-back or pick-up options should be available for those not living in the aforementioned locations. The commitments to work with RDs and IZWTAG are good steps.

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.

Section 6 – Transportation and Processing

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.

We congratulate BCUOMA on having surpassed the 75% capture rate identified in the Recycling Regulation and encourage BCUOMA on setting higher goals to push continual improvement in the oil EPR system and aim for collection 90% for all streams, and 95% for used oil.

The Zero Waste Hierarchy should be used to develop systems for the products to be redesigned, reduced, reused and recycled. 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. More filters should be shifted to recyclable types and containers, when not reusable, be recyclable. There is no mention of how the residuals in the extended suite of program products will be handled nor if any of their containers will be handled any differently than the existing ones.

BCUOMA should pay into more annual waste audits and coordinate with other stewardship agencies (usually through SABC) involved in local government waste audits. This should be equally spread across the province, not just focused on Metro Vancouver.

Section 8 – Program Marketing and Consumer Awareness

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 (ex. HHW & BUCOMA).

We encourage BCUOMA to set an ambitious goal to increase consumer awareness from the current level to 95% by the next plan renewal. Labelling and collaboration with other EPR programs would assist in raising the profile of BCUOMA to ensure it is properly capturing all material.

We would like to see BCUOMA communication materials in languages other than French and English. The District of Squamish would like to see materials produced in Punjabi and Tagalog, in particular

BCUOMA should provide local governments and regional districts updated lists of acceptable material and depot on a regular basis so they can update their own communication materials and ensure consistent and correct information.

The District of Squamish appreciates the opportunity to provide feedback and would like to reiterate that this is an opportunity to reduce environmental impacts and the efforts and initiatives in this area should be strengthened, alongside the creation of related targets for reuse, repair and refurbishment.

We hope to see increasingly ambitious goals for BCUOMA to further awareness and collection to ensure continued growth of the program.

Jeff Wint – Sustainability Coordinator

Shannon White – Integrated Solid Waste Specialist

From: Maria Lo Maria.Lo@metrovancover.org
Subject: BCUOMA Expansion to Additional Automotive Containers - Metro Vancouver Comments
Date: March 15, 2022 at 8:53 AM
To: David Lawes DLawes@usedoilrecycling.ca
Cc: Andrew Doi Andrew.Doi@metrovancover.org

ML

Hello BCUOMA,

Thank you for hosting the virtual consultation session on March 1 and for welcoming comments for the extended container category. Metro Vancouver staff attended the March 1 consultation session and reached out to our members for feedback on the proposed changes. Please see the comments below.

Program Benefits:

- Simplifies the recycling process for consumers of automotive related product containers and keeps them out of the garbage.
- Increases exposure of the BCUOMA program as more product types are accepted.
- Potentially reduces contamination in other EPR programs, such as Recycle BC, Product Care.

Implementation Concerns:

- How will BCUOMA avoid potential confusion for consumers and staff at the collection facilities in matching the materials to the proper program? The development of training and resources designed to address potential confusion needs to be considered.
- Additional staff and space may be required at collection sites, particularly with the acceptance of 210 L drums. Will collectors be able to opt out of collecting selected containers?
- What will the hauling frequency be to address potential space concerns?
- How will BCUOMA ensure producers are paying the cost for managing and accepting the expanded containers?
- Containers are sometimes returned with residual material. What is the plan for helping collectors manage residuals arriving at facilities, including secondary containment and leaky containers?
- Will there be one hauler for all BCUOMA containers or will depots need to source additional haulers?

Best Regards,

Maria Lo, P.Eng
Project Engineer
Solid Waste Services
Email: Maria.Lo@metrovancover.org
C: 778-883-7968
Office: 4515 Central Boulevard, Burnaby, BC V5H 0C6





March 14, 2022

RE: BCOUMA EPR Plan Amendment Consultation

The Regional District of Nanaimo would like to thank BCOUMA for the opportunity to comment on the EPR Plan amendment to expand the automotive containers collection program. We would also like to take this opportunity to commend BCOUMA on their commitment to working towards an enhanced level of program accessibility.

Our sole point of concern is the continuing absence of some automotive fluids from the collection program, specifically brake and power steering fluids. BCOUMA addressed similar concerns during BCSPC consultation presentation by saying these materials are intended to be used in their entirety and there should be little more than residual amounts remaining. However, this does not address a) the waste fluids that were drained from the automobile and b) expired and partially used containers. While volumes may not present as significant relative to lubricating oil volumes, BCOUMA collection sites receive small volumes of these materials on a regular basis. We are aware of instances where collectors received reduced rates for their used lubricating oils that were contaminated with non-lubricating hydraulic fluids. We believe a future expansion to collect these fluids would help serve customers and collectors, reduce the frequency of contamination in municipal waste and wastewater infrastructures, and reduce the presence of these materials in illegal dump sites.



Tamara Burns
Executive Director
Recycle BC

March 10, 2022

David Lawes
Executive Director
BC Used Oil Management Association
536 Broughton St, Victoria, BC
V8W 1C6

Subject: BC Used Oil Management Association (BCUOMA) plan to include additional automotive containers

Dear Mr. Lawes,

This letter is in response to the BCUOMA consultation regarding the expansion of its program to include additional automotive containers. The BCUOMA has identified the following containers it wishes to target as part of its expansion:

- Diesel exhaust fluid;
- Windshield washer fluid;
- Automotive additives;
- Aerosols, and;
- Other containers up to 210L.

Recycle BC operates a program for residential packaging and paper under Schedule 5 of the Province of BC's *Recycling Regulation*. As part of its government-approved Stewardship Plan, Recycle BC manages some of the products identified by the BCUOMA. Specifically, if these products are purchased by a British Columbia resident, producers currently pay fees to the Recycle BC program to ensure the responsible management of these materials.

Meanwhile, residents benefit from the convenience of being able to place most of these containers in their curbside recycling. In addition, Recycle BC has approximately 230 depots across the province that collect our materials, providing excellent access to recycling options for these materials.

Through discussion with the BCUOMA, Recycle BC understands the BCUOMA is primarily interested in collecting non-residential, institutional, commercial, or industrial products which, while often similar to residential materials, are not used by residential consumers. Recycle BC takes no position with regard to these non-residential materials, as they are not covered by Schedule 5 of the *Recycling Regulation* and our government-approved Stewardship Plan. However, Recycle BC does not believe it is appropriate for the BCUOMA to target products

405-221 West Esplanade
North Vancouver, BC V7M 3J3
778-588-9504

RecycleBC.ca





destined to be purchased by BC residents that already have a convenient collection system designed to manage them efficiently and effectively.

By way of this official response to BCUOMA's consultation, Recycle BC is copying the Ministry of Environment and Climate Change Strategy to provide notification of our position.

Sincerely,


Tamara Burns

CC:

Laurel Nash, Assistant Deputy Minister, Ministry of Environment and Climate Change Strategy

Sonya Sundberg, Executive Director, Ministry of Environment and Climate Change Strategy

Bob McDonald, Director, Ministry of Environment and Climate Change Strategy

David Lefebvre, Director, Public Affairs, Recycle BC

(b) Session Attendees (Automotive Container Expansion)

Feb 22 2022	Full Name	Organization Representing
1	Scott Boulton	Ford Motor Company of Canada
2	Shawn Dutton	Arpac Storage Systems
3	Larry Robertson	FCA Canada Inc.
4	Ruby Mendez	Mitsubishi Motor Sales of Canada Inc.
5	Eric Sasseville	Costco Wholesale Canada Ltd.
6	Amanda Lee	Costco Wholesale Canada Ltd.
7	Bob Banga	Wagonmaster Enterprises (BC)
8	Jordynn McMullen	Wagonmaster Enterprises (BC)
9	Chetan Patel	Kleen-Flo Tumbler Ind. Ltd.
10	Brian Fraser	Safety-Kleen
11	Kaman Cheung	Fastenal Canada
12	Melissa Santeramo	Acklands-Grainger Inc.
13	Mannie Cheung	Product Care
14	Fiona Shirran	Product Care
15	Shara Bonds	Product Care
16	Oge Moss	Vancouver Airport Authority
17	Brandy Deacon	Pat's Off-Road Transport Ltd.

Mar 1 2022	Full Name	Organization Representing
1	Sylvia Senroan	NCH
2	Jennifer Ivan	Comox Valley Regional District
3	Sue Maxwell	Zero Waste BC

Mar 1 2022	Full Name	Organization Representing
4	Mannie Cheung	Product Care
5	Shannon White	District of Squamish
6	Tera Grady	Cariboo Regional District
7	Alda Nicmans	BCPSC
8	Darren Murray	Reg District North Okanagan
9	Andrea Patrao	Sunshine Coast Regional District
10	Nathan Hartnett	Regional District of Fraser-Fort George
11	Marie-Lou Leblanc	Squamish-Lillooet Regional District
12	Abby McLennan	qathet Regional District/Let's Talk Trash
13	Travis Tanner	Regional District of Nanaimo
14	Janette Derksen	Regional District of Bulkley-Nechako
15	Amanda Kletchko	Cowichan Valley Regional District
16	Maria Lo	Metro Vancouver
17	Mark Bottomley	Lasqueti Island
18	Martin Dickson	Thompson-Nicola Regional District

APPENDIX C: Product Design and Use Trends

Term: November 2024 to November 2029

Interchange will continue to monitor the following and any other emerging product trends.

Lubricating Oil

- New vehicles are more efficient and require fewer oil changes. This trend could lead to lower sales of lubricating oil or less lubricating oil available for collection.
- The largest re-purposing application of lubricating oil is as burner fuel in shop heaters, a use that is currently acceptable to the Ministry of Environment and for which it provides guidance such as testing requirements.

Antifreeze

- No emerging trends currently noted.


Oil Filters

- Oil filters have typically been made of metal but in recent years more non-metals filters have been sold. Non-metal filters often have plastic and cardboard components that are lighter in weight than metal filters. Light-weighting of filters changes the recovery performance measurement methodology, and affects the estimate used to translate kilograms collected into units.
- Interchange is monitoring market trends in non-metal filters to identify any changes needed to the recovery measurement methodology. Findings on any changing trends in filters will be posted in the [Resources & Reports](#) section of the Interchange website.

Automotive Containers

- Containers have not changed in composition over recent years and the recycling methodology is well known. At times, manufacturers have used containers made of plastic that are difficult to recycle but this has not been the case of late.
- Interchange monitors the marketplace for new and growing trends in containers that could result in recycling challenges. These trends include “oil-in-a-box”, where the oil is in a plastic bladder bag and packaged in a cardboard box with a spout.
- Findings on any changing container trends that could impact the program (such as a UOMA study conducted with other Canadian programs) will be posted in the [Resources & Reports](#) section of the Interchange website.

APPENDIX D: Recycle BC – Future State Overview



BC USED OIL MANAGEMENT ASSOCIATION (BCUOMA)
Windshield Washer Fluid, Diesel Exhaust Fluid, and Automotive Additives Containers in Recycle BC System

POSSIBLE FUTURE STATE – OVERVIEW

Recycle BC is a not-for-profit organization delivering residential recycling services for packaging and paper product (PPP) to two million households across British Columbia. Recycle BC ensures that waste packaging and paper is collected from residents at households, through curbside and multi-family building collection, and recycling depots, and then sorted and recycled responsibly.

Recycle BC endeavours to have residents only use its blue box system for its stewarded packaging and paper; however, the reality is, some residents use the collection network for other stewardship program items such as the recycling of beverage alcohol deposit-return containers and beer & cider secondary packaging.

BCUOMA recently consulted regarding the expansion of its program to include additional automotive containers, some of which are currently managed through the Recycle BC program (e.g., windshield washer fluid, diesel exhaust fluid, and automotive additives containers). Today, producers pay fees to the Recycle BC program to ensure the responsible management of these materials and the residents benefit from the convenience of being able to place these containers in their curbside recycling; however, with the expansion of the BCUOMA program which includes IC&I containers, and the possibility of new regulatory changes creating an automotive program, it makes sense to consider a different arrangement.

Recycle BC is open to a commercial arrangement and offers a short overview of a possible future state.

Windshield Washer Fluid, Diesel Exhaust Fluid, and Automotive Additives Containers in Recycle BC System

Should BCUOMA wish to assume the obligation for the items currently in the Recycle BC program, it could be possible to maintain collection for residents through the blue box under a commercial agreement. Recycle BC already declares in its Annual Report both gross tonnes collected and net tonnes collected – the net tonnes collected and recovery rate reflecting the exclusion of tonnes collected by Recycle BC on behalf of other stewardship programs.

Recycle BC can calculate with a high degree of accuracy the quantity of material, by material type, collected across its system through an extensive and continuous monthly inbound composition audit (ICA) process that is conducted at its Centre for Material Intelligence in Surrey, BC.

To determine the quantities of BCUOMA containers, Recycle BC would use its monthly ICA process, which samples collection to a statistically provincially representative level, and add to this a secondary sort, count and record of the agreed-to BCUOMA containers for at minimum two sampling periods per year. The commercial financial arrangement would include a fee for the additional audit work and a price/tonne for the amount of containers collected and managed by Recycle BC. This procedure would

1



be conducted upon mutually agreed methodology, audit categories, and independent auditor oversight arrangements.

At a high level, the agreement design would enable Recycle BC to be paid for BCUDMA containers collected in its system and allow BCUDMA to claim the collection and recycling units and tonnage for these containers.

If BCUDMA is interested in Recycle BC's proposal as outlined at this high level, Recycle BC suggests the next step is for BCUDMA and Recycle BC to discuss timing with respect to the steward reporting/payment calendar and program plan approval timing, confirm details of an audit methodology (and visit Centre for Material Intelligence to observe the audit procedure), and draft an agreement to govern the commercial transaction for the specific containers.