
# Newfoundland and Labrador
# Oil and Glycol Stewardship Plan
# 2019 - 2023

**For submission to:**
Gary Ryan,
Multi-Materials Stewardship Board
Mount Pearl, NL

**For more information:**
UOMA NL
1-877 897-6448
UOMA-Atlantic.com

# 1. Introduction

The 2019-2023 Newfoundland and Labrador Oil and Glycol Stewardship Plan is submitted by UOMA NL, a division of Atlantic Used Oil Management Association (UOMA Atlantic, a private non-profit organization), division of Newfoundland and Labrador, to Multi-Materials Stewardship Board (MMSB), pursuant to the requirements of the Newfoundland and Labrador *Regulation 101/18, Waste Management Regulations, 2003 (Amendment) under the Environmental Protection Act (O.C. 2018-221), known as "*The Regulation".

This stewardship plan covers the term from 2019-2023 or such other period as specified by MMSB.

**DEFINITION**

In this stewardship Plan

1. *"Collection Facility or Return Facility"* means a facility that accepts the designated materials from persons who wish to return them and that is identified as a collection or return facility through an approved oil and glycol stewardship plan.

2. *"Collector"* means a business registered with UOMA NL to collect the products governed by the Regulation from Generators or Collection Facilities and deliver them to a Processor registered with UOMA NL.

3. *"Consumer"* means a person who uses oil, oil filters or glycol for his or her own purposes and not for the purpose of resale.

4. *"Designated materials"* means used oils, used oil containers with a capacity of 50 liters or less including used aerosol lubricant containers for all kinds of lubricants, used glycol (antifreeze) and its containers with a capacity of 50 liters or less, used aerosol containers for brake cleaners and used filters throughout the territory of the province of Newfoundland & Labrador, in accordance with "the Regulation".

5. *"Environmental Handling Charges (EHC)"* means the contribution paid to UOMA NL by its Brand Owners, as established by UOMA NL.

6. *"Generators"* means the users of the designated materials in the normal course of business or as private consumers.

7. "*Processor"* means a business registered with UOMA NL to reclaim (give a second life) the designated materials governed by the Regulation.

8. "*Return Incentives (RI)"* means the financial incentive disbursed by UOMA NL to Collectors registered with UOMA NL for recovery of designated materials.

# 2. UOMA NL

UOMA NL is created for the purpose of satisfying the requirements of "The Regulation" as an organization empowered to manage an integrated recovery and reclamation program for the designated products and increase user awareness. UOMA NL's vision is to deploy and manage a recovery and stewardship program for used oils, used antifreeze, oil or fluid and antifreeze containers (including lubricant aerosols and brake cleaners) and used filters, in an efficient and environmentally, economically and socially responsible manner. We propose to become a model of excellence from a sustainability perspective.

UOMA NL's mission is to manage an efficient recovery and stewardship program for designated products on behalf of its members, who are brand owners, in accordance with applicable regulations and from a sustainable development perspective.

UOMA Atlantic division NB and PE have been chosen by both provinces (New Brunswick and Prince Edward Island) as the official agent to manage the Used Oil and Glycol program. Both Atlantic provinces programs have been successful by first understanding how much oil, and other products, is sold or distributed in the provinces and then what is collected to clearly define environmental success rates. It is interesting to note that in 2017, 90.8% of the used oil in New Brunswick is collected and recycled. In Prince Edward Island there is similar success even though the program has not been in operation as long where 85.5% of used oil is collected and recycled. There are similar successes with the collection and recycling of the other automotive liquids, filters, glycol and containers. The New Brunswick program has been operating since 2014 while the Prince Edward Island initiative has just passed the three-year mark (April 2015) with over 170 members in New Brunswick and 107 in Prince Edward Island.

UOMA Atlantic has a close relationship with the province of Quebec has they have engaged SOGHU (Quebec's Used Oil Management Association) as their program manager. SOGHU is considered by the industry as one of the best Used Oil and Glycol program manager in the Country. UOMA Atlantic and SOGHU are also influential members of NUOMAAC (National Used Oil Material and Antifreeze Advisory Council) whose mandate is to coordinate the Canada-wide used oil and antifreeze recycling effort and encourages consistent national standards for this unique and successful industry-led stewardship recycling program and to have fully integrated programs in all provinces and territories of Canada. UOMA Atlantic efforts will follow as much as possible NUOMAAC's efforts always considering the provincial differences in regulation.

## 3. Program Membership and Program Funding

The plan is submitted by UOMA NL on behalf of the oil and glycol brand owners who have appointed UOMA NL as their agent under the Regulation (for current list of brand owners see **Appendix A).** The program is open to any brand owner to join.

> **PART VI article : 31.34**
>
> "brand owner", means a person who
>
> (i) manufactures oil, oil filters or glycol in the province and sells, offers for sale or distributes the oil, oil filters or glycol in the province,
>
> (ii) is an owner or licensee in the province of a registered or unregistered trademark under which oil, oil filters or glycol is sold, offered for sale or distributed in the province,
>
> (iii) brings oil, oil filters or glycol into the province for sale or distribution, or
>
> (iv) brings oil, oil filters or glycol into the province for use in a commercial enterprise.

Funding the program comes from an Environmental Handling Charge (EHC) imposed on the brand owners or first importers (UOMA NL members) in Newfoundland and Labrador, based on their sales of products subject to the regulation. The amounts of such Environmental Handling Charges (EHC) are harmonized as much as possible with those charged in western Canada, Quebec, New Brunswick and Prince Edward Island. Since return facilities (collection facilities) are an important element of the service offered to the public (do it yourself), UOMA NL will work on developing a suitable network of return facilities (collection facilities) in order to provide the maximum number of locations throughout the province where the designated products can be returned free of charge.

Program revenues are applied to the operation of the program, including education, collection system, administration, transport, recycling and disposal of collected residual products as well as a reserve fund. The policy of the program is not to have the reserve fund exceed one year's operating expenses. Environmental Handling Charge rates might be adjusted as needed with the sole purpose of maintaining the viability of the program.

# 4. Program Products

**Product Definition**

The UOMA NL Program manages post-consumer leftover “oil” and “glycol” as defined in the Regulation:

> "glycol" means ethylene or propylene glycol used or intended for use as a vehicle or commercial engine coolant, but does not include the following:
>
> (i) plumbing antifreeze,
>
> (ii) windshield washer antifreeze,
>
> (iii) lock de-icer and lock antifreeze, and
>
> (iv) gasoline and diesel fuel antifreeze;
>
> "glycol container" means a container with a capacity of 50 litres or less manufactured for the purpose of holding glycol;
>
> "oil" means
>
> (i) petroleum or synthetic derived crankcase oil, engine oil and gear oil,
>
> (ii) hydraulic fluid, transmission fluid and heat transfer fluid, and
>
> (iii) fluid used for lubricating purposes in machinery or equipment;
>
> "oil container" means a container with a capacity of 50 litres or less manufactured for the purpose of holding oil;
>
> "oil filter" means a spin-on style or element style fluid filter that is used in hydraulic, transmission or internal combustion engine applications and includes a diesel fuel filter, a storage tank fuel filter, a household furnace oil filter but does not include a gasoline filter.

**Products Accepted**

For further clarity, the following oil and glycol products are included as accepted program products.

This list is subject to change by UOMA NL.

**EHC applicable** on *Oil Fluid and Container*

| Description | Product | Container (50 L or less) |
|---|---|---|
| circulating oil or turbine oil | yes | yes |
| compressor oil | yes | yes |
| gear oil | yes | yes |
| hydraulic fluid | yes | yes |
| marine engine oil for vessels operating domestically | yes | yes |
| mineral heat transfer fluid | yes | yes |

| | | |
|---|---|---|
| natural gas compressor oil not consumed in use | yes | yes |
| paper machine oil | yes | yes |
| petroleum crankcase or engine oil | yes | yes |
| polyolester fluids | yes | yes |
| power steering fluid | yes | yes |
| refrigeration system oil | yes | yes |
| re-refined oil | yes | yes |
| synthetic crankcase or engine oil | yes | yes |
| transmission fluid | yes | yes |
| turbine oil | yes | yes |
| vegetable oil for lubrication | yes | yes |

**EHC applicable** on *Oil Container only*

| Description | Product | Container (50 L or less) |
|---|---|---|
| 2-cycle engine oil | no | yes |
| agricultural spray oil | no | yes |
| anti-seize lubricant | no | yes |
| chain oil | no | yes |
| conveyor lube | no | yes |
| dedusting oil | no | yes |
| drawing, stamping and shaping oil | no | yes |
| dripless lube | no | yes |
| emulsified oil | no | yes |
| food grade white mineral oil | no | yes |
| form release oil | no | yes |
| gasoline/2-cycle engine oil mixes | no | yes |
| machine tool and slideway lubricant | no | yes |
| marine cylinder oil | no | yes |
| metal working oil | no | yes |
| natural gas compressor oil consume in use | no | yes |
| pneumatic system oil | no | yes |
| process oil | no | yes |
| guenching oil | no | yes |
| rock drill oil | no | yes |
| rustproof oil | no | yes |
| saw guide oil | no | yes |
| silicone lubricant | no | yes |
| textile oil | no | yes |
| wiring pulling lubricant (petroleum or vegetable based) | no | yes |

**EHC applicable** *on Automotive Antifreeze Fluid* and *Container*

| Description | Product | Container (50 L or less) |
|---|---|---|
| ethylene glycol vehicle engine coolant | yes | yes |
| propylene glycol vehicle engine coolant | yes | yes |

**EHC applicable** on *Aerosol Container*

| Description | Product | Container (50 L or less) |
|---|---|---|
| aerosol propelled lubricant | no | yes |
| aerosol brake cleaner | no | yes |
| aerosol grease | no | no |
| aerosol paint | no | no |
| aerosol solvent/cleaner | no | no |

**EHC applicable** on *Filters*

| Description | Product |
|---|---|
| spin-on or element style filter that is used in hydraulic, transmission or internal combustion engine applications including diesel fuel filter | yes |
| coolant filter (also known as water filter) | yes |
| diesel fuel filter used at retail & commercial pump islands | yes |
| household furnace fuel filter | yes |
| oil / air separator filter | yes |
| plastic / paper element style filter | yes |
| storage tank diesel fuel filter | yes |
| sump type automatic transmission filter | yes |

**Brand Owner of Products**

The UOMA NL program accepts Program products sold in Newfoundland and Labrador regardless of the brand owner.

**Type of User**

The UOMA NL Program accepts program oil and glycol sold in Newfoundland and Labrador from any consumer/user of the Program products including household, commercial and government generators.

**Non-Program Material**

Non-program materials introduce unfunded costs and safety hazards into the system and are not to be accepted. In the initial stage of the UOMA NL program, information to all collectors and outreach to the general public will be critical. Communication is a major element in the success of any post-consumer collection program and UOMA NL intends to make this a priority.

All products purchased outside Newfoundland and Labrador becomes the responsibility of the importer.

**EHC <u>not</u> applicable** on either Product or Container

| Description | Product | Container (50 L or less) |
|---|---|---|
| 3-in-1 household oil | no | no |
| base oil, including re-refined base oil | no | no |
| brake fluid | no | no |
| cleaning/flushing fluids for motors/equipment | no | no |
| cooking oil | no | no |
| diesel fuel treatment | no | no |
| Electrical insulating oil | no | no |
| emulsified oil | no | no |
| ethylene glycol heat transfer fluid | no | no |
| export oil sales | no | no |
| glycol-based heat transfer fluid | no | no |
| grease | no | no |
| gun oil | no | no |
| heating furnace oil | no | no |
| hydraulic jack oil | no | no |
| hydraulic oil dye | no | no |
| kerosene | no | no |
| marine engine oil for vessels operating internationally | no | no |
| oil additive | no | no |
| oil treatment | no | no |
| penetrating oil | no | no |
| phosphate ester hydraulic fluid | no | no |
| polyglycol synthetic compressor oil | no | no |
| propylene glycol heat transfer fluid | no | no |
| sewing machine oil | no | no |
| silicone heat transfer fluid | no | no |
| solvents | no | no |
| synthetic aromatic hydrocarbon heat transfer fluid | no | no |
| undercoating | no | no |
| urethane coating | no | no |
| water glycol hydraulic fluid | no | no |
| wax | no | no |
| windshield washer fluid | no | no |
| windshield washer fluid | no | no |
| winter start fluid | no | no |

**EHC not applicable** on Filters

| Description | Product |
|---|---|
| air filter | no |
| crankcase ventilation filter | no |
| gasoline fuel filter | no |
| household furnace air filter | no |
| sock-type filter | no |

**EHC not applicable** on Antifreeze and Container

| Description | Product |
|---|---|
| aircraft de-icing fluid | no |
| antifreeze plumbing fluid | no |
| fuel line de-icing fluid | no |
| lock de-icing fluid | no |
| windshield washer fluid | no |

# 5. Management of Collected Oil and Glycol

## 5.1 Used Oil and Glycol Management

UOMA NL's role is to recover and recycle post-consumer oils, used antifreeze, used oil or fluid and antifreeze containers of 50 liters or less (including lubricant aerosols and brake cleaners), and used oil filters. It will consequently set up a recovery and reclamation system that will regularly be reassessed and adapted. The program products must not only be recovered, but recycled in accordance with all applicable regulations. The objective is for all products to be 100% reclaimed and have a second life.

**Used Oil**
Oils will either be re-refined or processed and recycled as energy or any other way accepted by the Regulation. Recycling of used oil by energy reclamation is strictly controlled; the oils must be analyzed to ensure they meet the regulatory standards, including the percentage of water.

- Re-refined, regenerated
- Energy Recovery

**Oil Filters**
Filters are at the processor level, crushed and/or compressed to extract the oil so that they can be recycled (foundry or any acceptable method in Newfoundland and Labrador). A second method feeds them into huge furnaces – the oil assists heating, while the residual material

contributes sulfur that otherwise would have to be added, and the metal is recovered or any other way accepted by the Regulation. We anticipate that the used oil filters be crushed and recycled at AIM metal in St. John's Newfoundland or at JRS Salvage in Sussex New Brunswick.

- Recycled for manufacturing
- Reused for smelter

**Oil & Glycol Containers**

Containers should be reused or decontaminated, recycled and reintroduced into other products such as farm drains, bins, composite construction materials, etc. or any other way accepted by the Regulation. The used oil and glycol will be collected and processed by RPM Eco based in Blainville Quebec.

- Recycled for manufacturing
- Reused

**Used Glycol**

- Reprocessing as glycol (variety of quality based on end-use). The glycol will be processed at Terrapure Environmental (Envirosystems) in Sussex New Brunswick.

**Aerosol cans**

Designated aerosol cans will be depressurized, crushed and the metal is recovered or any other way accepted by the regulation. We anticipate that the aerosol cans be processed at AIM metal in St. John's Newfoundland or at JRS Salvage in Sussex New Brunswick.

- Recycled for metal content (with filtration and gas collection).

**Contaminated Oil/Glycol and Non-program Materials**

In the event that contaminated and/or non-program materials enter the program, they become the sole responsibility of the collector.

UOMA NL is constantly assessing methods that could improve the applicability of the 3Rs in a life cycle perspective and take them into account in establishing its return incentives, where applicable.

## 5.2 Program Accessibility

Every region of Newfoundland and Labrador will be serviced by registered UOMA NL collectors. The service offered to garages, harbours and industry (IC&I) represents almost 90% of the volume and is based on free enterprise, where the generators will have the choice of choosing any registered collector and call them to request collection. These registered collectors will have to deliver the program products they recover to processors registered with UOMA NL. Some of these generators will become public collection facilities also registered with UOMA NL. UOMA NL will work with regional authorities in Newfoundland and Labrador and commercial generators where citizens from across Newfoundland and Labrador will be able to return the program products free of charge. A list of all collectors for large generators and collection facilities for smaller generators will be available on UOMA NL's website.

**Collection network**

UOMA NL's program Return Incentives consider population density and geographic issues in a manner that all Newfoundland and Labrador residents receive similar levels of service.

Generally, the system will utilize existing infrastructure such as:

- garages and service facilities
- participating Regional Authorities (solid waste management sites)
- harbours
- participating retailers
- one day collection events – in cooperation with participating Regional Waste Management Authorities.

Again, program Return Incentives to collectors will assure complete provincial coverage across Newfoundland and Labrador.

**List of Sites and Roll-out:** Attached as Appendix B is a list of collection site locations which have been identified, any deviation or variation from the list provided requires MMSB approval. UOMA NL's intent is to provide blanket coverage for collection across Newfoundland and Labrador. We will work closely with current private sector operators and specialized hazardous collector firms plus all public sector authorities in order to achieve maximum coverage. Collectors will be responsible collect from garages, harbours, dealerships and large volume users based on incentives offered by UOMA NL.

**Large volume users:** Financial Return Incentives to collectors act as a motivator to full-service collection across Newfoundland and Labrador regardless of location or size of operation. With incentives as an integral part of the program, collectors receive more money than they were able to charge generators prior to the establishment of the Stewardship Program. This assures that regardless of volume generated, large and small volume generators will receive collection services by registered UOMA NL service providers.

**Service Providers:** Products are currently being managed by specialized service providers such as collectors and collection facilities in most areas of Newfoundland and Labrador. Collectors and collection facilities are fully responsible for all necessary health and safety aspects of the collection, transportation and temporary storage of all collected material. UOMA NL will assure before registration that all service providers conform to all regulatory and environmental laws of Newfoundland and Labrador.

**Collections System:** UOMA NL partnership agreement with collectors and processors is critical to the success of the program. Contractual agreements allow UOMA NL to maintain full control of the program at all times.

**Transportation and Consolidation:** UOMA NL will track geographic areas being serviced, quantities collected per drop-off locations and monitor quality of the collected materials on an ongoing basis. Collected material will then be managed by designated processors and reported to authorized regulatory agencies.

**Program Accessibility**

UOMA NL's intent is to provide complete coverage across Newfoundland and Labrador. We will work with current private sector operators and specialized hazardous collectors plus all public sector authorities in order to achieve maximum coverage.

The success of the program will depend on consumer awareness and program accessibility, meaning convenient access to collection sites. It will be an ongoing objective of the program to continually make it more convenient for people to dispose of their leftover oil and glycol.

Variables which contribute to accessibility include:

- number, location of collection sites relative to the distribution of population in Newfoundland and Labrador
- hours of operation of collection sites
- ease of access to program information including collection site locations.

The proposed collection site network will be developed with a view to optimizing these variables based on voluntary available information. Following program implementation it will be important to gather data by which to assess accessibility such as:

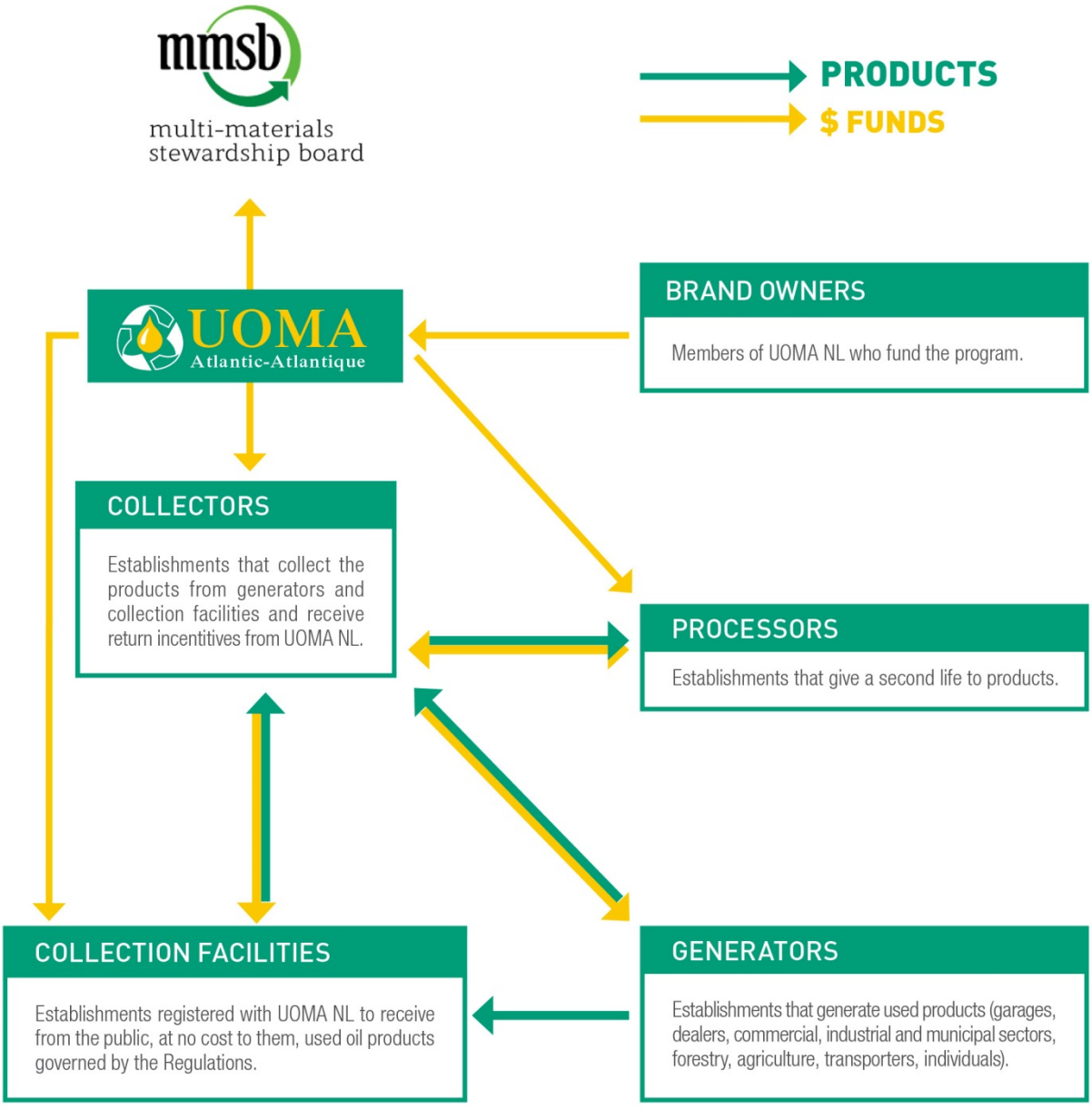
- distance and travel time for users, using geographic information systems (GIS) - map-based analysis tools on service radius (time or distance), postal codes, etc.
- user feedback and program awareness surveys, conducted at collection sites, through the program's 800 number enquiry service and by telephone surveys

Based on the findings from these evaluations, accessibility can be analyzed, and targets can be developed for subsequent years of the program that will provide for greater accessibility for residents throughout Newfoundland and Labrador.

**Business Model**

UOMA NL program is funded by the **brand owners** (member of the association). The funds received are distributed as return incentives to **collectors** based on the region of the collected products and to oil and glycol plastic container processors for the decontamination of the product. No incentives are given until UOMA NL receives proof that the products have been given a second life (processed). The products are then sent to **processors** where the products are given a second life.

# STANDARD FLOW CYCLE
# OF FUNDS AND PRODUCTS



**Methods to be used for the collection, storage, transportation and recycling of the products.**

**Used Oil** will be collected at the generators using a tanker truck. Most generators actually have the infrastructure to store the used oil. If they do not have one, the collector will supply 45 gallon drums to them.

**Used filters and aerosols** will be collected in a 240-L or 360-L wheeled plastic bins supplied by the collector to the generator. The collector will collect the filters changing the full bin by an empty bin.

**Used oil and glycol containers** will be collected in plastic bags stored in a 360-L plastic bin both supplied by the collector.

**Used Glycol** will be collected at the generators in 45 Gallon drums supplied by the collector.

The used filters, aerosols and glycol are commonly collected in the same truck. Used oil is collected using a tanker truck and the used oil and glycol plastic containers in a trailer pulled by a pick-up truck. All vehicles used for the collection of the designated material have containment in case of a spill and need to be in compliance with regulation if applicable.

In all cases the frequency of the collected products will depend on the volumes generated by the generators and the region serviced.

## 5.3 Product Sales

The quantity of oil and glycol sold annually varies with market conditions, but is an important reference for the quantity of materials available for collection in the future.

Estimated sales volumes for the materials included in the UOMA NL plan

| **Products** | **Volumes** |
|---|---|
| Oil (litres) | 11 000 000 |
| Filters (units) | 1 000 000 |
| Oil Containers (litres) | 6 000 000 |
| Glycol/Antifreeze (litres) | 1 500 000 |
| Glycol/Antifreeze Containers (litres) | 825 000 |

## 5.4 Oil and Glycol Collection Rates

UOMA NL utilizes a number of performance measures to track the program's performance year to year. Performance measures applicable to this program include:

- Volume reused
- Volume consumed in use or lost
- Residual Recovery Volume
- Recovery Rate

No single performance measure is considered an accurate indication of the program's performance and in some cases the performance measure is influenced by factors that are beyond the program's control such as market conditions. Since Newfoundland and Labrador's geography and commercial activities is proportionately similar to those of the neighbouring province of Quebec, New Brunswick and Prince Edward Island, several of the benchmarks will be the same. A portion of the used oils is burned during regular use in motors, and the percentage varies depending on such use. Studies have been conducted in the different provinces to determine this percentage. The filter recovery rate will be calculated with benchmarks used in Quebec.

### 5.4.1 Residual Recovery Volume

> (l) Information with respect to the manner in which the oil and glycol stewardship plan will achieve the recovery rates set out in sections 31.44 and 31.45.

The regulation states that specific Recovery Rates must be achieved by the program and this is the performance target used by the Program. Under the Regulation those targets are as follows:

> **31.44** (1) Within 2 years after the implementation of an oil and glycol stewardship plan, and in the subsequent calendar year, a brand owner shall achieve the following recovery rates:
>
> (*a*)for oil, a rate of at least 50%;
>
> (*b*)for oil filters, a rate of at least 25%; and
>
> (*c*)for oil containers, a rate of at least 25%.

> **31.44** (2) Within 4 years after the implementation of an oil and glycol stewardship plan, a brand owner shall achieve the following recovery rates:
>
> (*a*)for oil, at least 65%;
>
> (*b*)for oil filters, at least 50%; and
>
> (*c*)for oil containers, at least 50%.

**31.44** (3) Within 5 years after the implementation of the oil and glycol stewardship plan, and in each subsequent calendar year, a brand owner shall achieve the following recovery rates:

(*a*)for oil, at least 75%;

(*b*)for oil filters, at least 75%; and

(*c*)for oil containers, at least 75%.

**31.45** (1) Within 4 years after the implementation of an oil and glycol stewardship plan and in the subsequent calendar year, a brand owner shall achieve a recovery rate of at least 50% for glycol and glycol containers.

**31.45** (2) Within 6 years after the implementation of an oil and glycol stewardship plan, and each subsequent calendar year, a brand owner shall achieve a recovery rate of at least 65% for glycol and glycol containers.

**31.45 (3)** Within 7 years after the implementation of an oil and glycol stewardship plan, and in each subsequent calendar year, a brand owner shall achieve a recovery rate of at least 75% for glycol and glycol containers.

UOMA NL implementation strategy will emphasize communication and outreach efforts designed to highlight the environmental benefits of properly managing the programmed products. Incentives to collectors and processors are nevertheless a significant financial driver to reaching target volumes in any collection program.

### 5.4.2 Reuse Rate

The regulation states that an annual recovery rate must be achieved by the program and this is the performance target used by the Program. The Regulation defines “reuse” as:

“reuse” , with respect to used oil and used glycol, means to process the used oil and used glycol so that it is capable of being used by a consumer in a manner that would be compliant with the Act.

### 5.4.3 Recovery Rate

The Recovery Rate compares the volume of oil or glycol collected in a given year to the volume of oil and glycol sold and available for recovery in that same year (collected/sold). The most significant challenge in Newfoundland and Labrador is determining the percentage of waste oil currently being reused in oil-burning furnaces and the volume of oil filters being discarded in Newfoundland and Labrador sanitary landfill sites. UOMA NL will work closely with MMSB to assess this matter.

### 5.4.4 Estimated volumes collected

Based on collection history in New Brunswick and Prince Edward Island and on the projected volumes market in the province of Newfoundland and Labrador, UOMA NL estimates the volumes collected to be

| Product | Estimated volume | | Collection rate |
|---|---|---|---|
| Used Oil [1] | 6 545 000 | Liters | 85% |
| Used filters | 700 000 | Units | 70% |
| Used oil containers *[2] | 4 560 000 | Liters | 80% |
| Used Glycol [3] | 375 000 | Liters | 50% |
| Used glycol containers | 495 000 | Liters | 60% |

* Includes lubricating aerosols and brake cleaners

1. Based on a study made in 2010, 30% of the oil is consumed in use and consequently non recoverable.
2. Based on a study made in 2006, 5% of the used oil containers are reuse.
3. Based on a study made in 2012 that is being reviewed in 2019, 45% of used glycol is recoverable.

### 5.4.5 Local economic benefits

The difficulty in estimating the local benefits of the UOMA NL program mostly depends if the products will be processed in Newfoundland and Labrador or not. However the following benefits will occur factoring out the processing.

- UOMA NL will engage a full-time representative in year one and part-time in year two and after
- All collectors will need
    - to engage employees to collect the designated products
    - to purchase vehicles for collection purpose
    - to purchase storage bins and drums for generators.
- Generators will no longer have to pay to dispose of the designated products
- Transportation of the designated products outside the province

If processing is made in the province

- Processors will need to purchase in processing equipment like compactors and balors
- If the volume of oily and glycol plastic containers is high enough, there is a possibility of having a plant like the one in Moncton where there are four full-time employees working along with all other local benefits a plant generates in a region.

# 6. Design for Environment

The overall program objective is to reduce the environmental impact of leftover oil and glycol through the application of the pollution prevention hierarchy of (i) reuse, (ii) recycle, (iii) recovery of energy and (iv) disposal. With respect to the concept of design for environment, there is limited ability of a stewardship program of this scope to influence product design. The oil and glycol industries are consolidating and most brand owners manufacture for a market area on a multinational level. Major factors that influence design for the environment are general market conditions, competition amongst industry players and the amount of the EHC imposed on particular products (varies based on recyclability).

The Regulation requires brand owners to describe efforts to redesign oil and glycol products to improve reusability and recyclability. The oil and glycol industry is a consolidated industry and most brand owners manufacture for a market area that includes more than one province or country.

The overall program objective is to reduce the environmental impact of leftover oil and glycol through the application of the pollution prevention hierarchy of reduce/reuse/recycle. The program will continue to seek improvements in the reduction of environmental impact through a number of pathways.

Product design has evolved considerably in recent years with an emphasis on performance and pollution prevention. Nevertheless, UOMA NL charges higher EHC for non-recyclable products and/or containers with a clear intent on promoting total-recyclability. Many of the products included in the UOMA NL program will change over time as a result of design for environment activities and we will continue to promote products with a high degree of recyclability.

# 7. Communications and Public Awareness

### 7.1 Program Communications

UOMA NL uses a number of methods to communicate information about the program to the public and to increase awareness of the program and its objectives, including:

- **Program Website:** The NL Oil and Glycol website at UOMA NL.com provides information to NL residents on:
  - Depot locations with details on hours of operation and products accepted
  - Description of products accepted by the program
  - Details on relevant EHC
  - Annual reports and other program information
  - The program web page links to Newfoundland and Labrador's ReThinkWaste NL web age (rethinkwastenl.ca).
- **Social Media:** To be developed as part of a communication and marketing plan.

- **MMSB Hotline:** Hotline operated by Recycle Newfoundland and Labrador provides free information on where to recycle any type of material:
- **UOMA NL hotline**: Bilingual hotline operated by UOMA NL provides free information on where to recycle designated material: 1-877-987-6448
- **Local Government Partnerships**: the Program works with the Regional Waste Management Authorities to promote the Newfoundland and Labrador Oil and Glycol Product Stewardship Plan.
- **Other Partnerships:** The program will collaborate with other NL product stewardship programs as they develop
- **Point of Sale (PoS) Materials:** Brochures, etc. are given out at retail stores, trade shows, and Regional Waste Management Authorities. Orders are replenished upon request, free of charge, and materials are regularly updated
- **Direct Mailings**: Dedicated mailings to targeted groups such as automotive garages are conducted to promote the program.
- **Marketing & Media Buying**: Marketing is a key component in creating awareness of the new program and sustaining interest overtime. An initial multimedia campaign is essential to the success of the program. Thereafter, a communications and marketing plan will determine future audiences and requirements.
- **Earned Media:** The program will develop an earned media strategy as part of its communications and marketing plan.

**Program Rollout and Communications Targets**

The Program has the following targets for communications: Initially program is introduced to members, collectors and processors. Once established, UOMA NL in cooperation with MMSB and the province of Newfoundland and Labrador will officially launch the program to the general public. Communication efforts will be integral to the stewardship plan success and evolve with specific needs. Quantitative research will be used to measure program awareness and perception at various intervals of the program's implementation stage.

Program Launch

The communications plan for the program includes a "program launch". Details of the launch plan are set forth in Appendix C.

## Performance Measurement

**Consumed in Use Rate:** Current data in other jurisdictions (BC, Alberta, Manitoba and Quebec) indicate an average in-use consumption rate of 30% and this based on a study done by ni Environnement/Dessau "Review of Recoverable Used Oil in Quebec" in 2010. UOMA NL will work closely with regulatory authorities to measure and monitor this activity in Newfoundland and Labrador.
**Recovery Rates:** Comparing yearly collected volumes to reported sales data allows UOMA NL to measure program performance on a provincial level.

**Historical comparison:** Initially program (launch period 1-3 years) volumes will be on the lower scale for certain product types (containers, filters, glycol and antifreeze). As program maturity is attained, volumes are expected to increase to a stable level. Other used-oil management programs in Canada have predictable year-over-year volumes once programs are fully implemented.

**Benchmarking: Recovery rates (2017) for similar stewardship programs in Canada.**

**British Columbia**

| | |
|---|---|
| 69% | Used oil |
| 87% | Oil filters |
| 83% | Oil and glycol containers |
| 43% | Used antifreeze |

**Alberta**

| | |
|---|---|
| 84% | Used oil |
| 87% | Oil filters |
| 86% | Oil containers |

**Saskatchewan**

| | |
|---|---|
| 75% | Used oil |
| 80% | Oil filters |
| 39% | Oil containers |
| 11% | Used glycol |

**Manitoba**

| | |
|---|---|
| 78% | Used oil |
| 81% | Oil filters |
| 26% | Oil containers |

**Quebec**

85% Used oil
87% Oil filters
94% Oil containers
27% Used glycol

**New Brunswick**

91% Used oil
68% Oil filters
67% Oil containers
27% Used glycol

**Prince Edward Island**

86% Used oil
45% Oil filters
100% Oil containers
45% Used glycol

**Containers recovered:** Comparing collected volumes to reported sales data (required reporting - Membership Agreement) allows UOMA NL to measure program performance on a provincial level. Nevertheless the UOMA NL Membership Agreement does stipulate that 25% of all members will be audited annually. This enables UOMA NL to maintain valid information of its members as it pertains to sales to volume collected data.

**Waste audits:** In the event that additional market information is required or in need of validation, waste audits can be a useful tool to determine performance information. UOMA NL will consider using waste audit techniques as a means of gathering additional market information on a per need basis.

**Consumer awareness:** Communication efforts will be an integral part of stewardship plan success and evolve with specific needs. Quantitative research will be used to measure program awareness and perception at various intervals of the program implementation.

**Collection Sites:** UOMA NL is intent on having a blanket coverage of the Newfoundland and Labrador landscape for the Oil and Glycol Product Stewardship Program. UOMA NL will work closely with MMSB, Waste Management Authorities, Harbour Authorities and regulatory officials in Newfoundland and Labrador in determining the optimal coverage required to attain maximum performance.

## Independent assessment of plan

UOMA NL will provide for an independent assessment of the program plan following consultation with MMSB to determine the parameters of the assessment.

**Appendix A**

**List of Brand Owners who have already appointed UOMA NL as their Agent for the Newfoundland and Labrador Oil and Glycol Stewardship Program**

| Brand Owner Name |
|---|
| Home Hardware Stores Limited |
| Mann+Hummel Filtration Technologie Canada ULC |
| Parkland Fuel Corporation |
| Parts of Trucks Inc. |
| Superline Fuels |
| Uni-Select Eastern Inc. |
| Wakefield Canada Inc. |

## Appendix B Public oil/glycol Collection Facilities proposed by region

| **Island Portion** | | |
|---|---|---|
| **Region** | **City/Town** | **Qty** |
| Baie Verte Green Bay | Baie Verte | 1 |
| Baie Verte Green Bay | Robert's Arm | 1 |
| Baie Verte Green Bay | Springdale | 1 |
| Burin | Marystown | 2 |
| Central | Botwood | 1 |
| Central | Fogo | 1 |
| Central | Gambo | 1 |
| Central | Gander | 2 |
| Central | Glovertown | 1 |
| Central | Grand Falls Windsor | 2 |
| Central | Hare Bay/Indian Bay area | 1 |
| Central | Lewisporte | 1 |
| Central | New World Island/Twillingate area | 1 |
| Coast of Bays | St. Alban's/Harbour Breton area | 1 |
| Discovery | Bonavista and area | 2 |
| Eastern | Bay Roberts | 1 |
| Eastern | Carbonear | 1 |
| Eastern | Clarenville | 1 |
| Eastern | Placentia area | 2 |
| Eastern | St. John's Census Metro Area, inc Southern Shore | 25 |
| Northern | Hawke's Bay/Port Saunders/Port au Choix area | 1 |
| Northern | Rocky Harbour | 1 |
| Northern | St. Anthony | 1 |
| Western | Burgeo | 1 |
| Western | Corner Brook | 2 |
| Western | Deer Lake | 1 |
| Western | Port aux Basques | 1 |
| Western | Stephenville | 2 |
| **Total Island Portions** | | **59** |
| **Labrador** | | |
| Central | Happy Valley/Goose Bay | 2 |
| Southern | Port Hope Simpson | 1 |
| Southern | Forteau | 1 |
| Western | Labrador City/Wabush | 2 |
| **Total Labrador** | | **6** |

| **Collection Services/Events** | |
|---|---|
| Burin | Grand Bank/Fortune area |
| Northern | Roddickton/Englee area |
| Eastern | Southern Avalon area |
| Northern Labrador | Cartwright, Rigolet, Postville, Makkovik, Hopedale, Nain |

**Plus ALL public collection facilities (waste management authorities) that have permanent return infrastructure for the collection of Used Oil and other products covered under the regulation**

## Appendix C Program Launch Plan

It is proposed that the system will be launched in two phases:

- Phase 1: Spring 2019 – "Pre announcement". During this program development period, the program will commit to the launch date and advise the public on what changes they can expect to see when the new program starts.

- Phase 2: July 1, 2019 – "launch" It is proposed that Phase 2 will begin with a formal program launch over the period July - September 2019 (described in following section). On the program start date of July 1, 2019 the program anticipates having in place the majority of collection sites in the province-wide collection system including participating regional waste management, garages and retail sites. July 1, 2019 will also be the effective date of the obligation of brand owners to remit fees on the sale of program products.

Launch messages

- MMSB overseeing new oil and glycol stewardship program under regulation
- Recycling used oil and glycol just got easier in Newfoundland and Labrador
- Brand owners that manufacture and market oil and glycol are taking stewardship responsibility for their products and now cover the cost of recovering the oil/glycol, containers and filters for recycling or proper disposal if needed.
- Partnership with regional waste management, garages, retailers and others for collection system
- All operations Atlantic Canada (locally) based – collection, transport, processing (eastern Canada)

Program information

- NL oil and glycol program has started
- Program will provide citizens from Newfoundland and Labrador with answers to the what, where, how and why they should recycle used oil and glycol materials
- UOMA NL, industry program manager, has worked with municipalities and commercial/retail organizations to establish a convenient province-wide collection system, system will continue to improve over time
- Oil and glycol products covered by the program can be dropped off without charge at any of the collection sites
- Oil is recovered as a valuable resource while the filters and containers are recycled into new products. Materials of insufficient quality to be recycled will be managed in an environmentally responsible way.

Tactics/rollout

Communications Materials: News release with backgrounder, Q&A and Talking Points

- Announcement of commencement of the program, description of industry role, what is in place, how the program will roll out and what consumers will see in the spring, note the key objectives of increased access and environmentally management.
- Possible quotes from minister, MMSB chair, NL Regional Waste Management, oil industry/UOMA NL rep, consumers or environmental associations
- include list of collection sites
- Identify 800 number and website
- Distribution: province-wide news desks, reporters who have shown an interest, trade magazines, stakeholders
- Highlight the NL Oil/Glycol program website homepage for more information
- Post on NL Env and MMSB websites/ media pages

Advertising: Primary methods considered will include:

- radio ads
- newspaper and alternative media ads

Other communications products

- Update FAQs and other information as necessary on website and in other materials
- Display material (branding) – pop up banner(s) for events/photo ops

Evaluation of launch

- Calls to 800 number
- MMSB and stakeholder feedback
- Media coverage, tone/content/position
- Municipal and commercial/retail feedback