



Used Oil Management Associations

Consultation to Update the “Initial Fill (OEM) Category Summary”

March 15, 2017

British Columbia Used Oil Management Association (BCUOMA)

Alberta Used Oil Management Association (AUOMA)

Saskatchewan Association for Resource Recovery Corporation (SARRC)

Manitoba Association for Resource Recovery Corporation (MARRC)

Société de gestion des huiles usagées (SOGHU)

Atlantic Used Oil Management Association (SOGHUOMA)

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Background

The Used Oil Management Association (UOMA) is a national organization created by the six provincial Associations (collectively called the Associations) approved under provincial regulations to design, implement, and operate used oil and antifreeze material recycling programs in Canada: i.e., the British Columbia Used Oil Management Association (BCUOMA), Alberta Used Oil Management Association (AUOMA), Saskatchewan Association for Resource Recovery Corp (SARRC), Manitoba Association for Resource Recovery Corp (MARRC), Société de gestion des huiles usagées (SOGHU), and Atlantic Used Oil Management Association (SOGHUOMA) for New Brunswick and Prince Edward Island. Collectively they are referred to as ‘the Associations’. AUOMA, SARRC and MARRC have operated programs in their respective jurisdictions for at least two decades; BCUOMA has operated since 2003; SOGHU has operated since 2004; and SOGUOMA has operated programs since 2014 in New Brunswick, and 2015 in Prince Edward Island.

The national UOMA works proactively across provincial borders to coordinate and harmonize provincial programs to the greatest extent possible with an aim to improve the cost efficiency and effectiveness of the provincial programs, while ensuring the provincial Associations maintain the independence needed to meet local provincial regulations, local needs, and provide effective implementation of on-the-ground programs. To date, key national UOMA projects have included the implementation of nationally coordinated EHC compliance auditing to ensure each UOMA member (steward) pays their fair share; a national e-claims platform (for the collection of registered collector and processor data) to move the Associations towards electronic (paperless) data collection and record keeping; a national member newsletter and a national website; a one-window system for members to submit their data and Environmental Handling Charge (EHC) payments (new); and a national communications plan because messaging about the importance of and how to recycle used oil and antifreeze materials should be common across all provincial borders (new). The national UOMA also encourages each province to harmonize the material managed by their provincial programs, the EHCs collected on each material, and the EHCs collected from the Original Equipment Manufacturers (OEM) on the initial fill vehicles and equipment sold or imported into Canada. You can find out more about the national UOMA and provincial Associations [here](#).

The Associations began levying EHCs on OEM on July 1st, 2013 (April 1, 2014 in Saskatchewan), under the guidance of the national UOMA. While the collection of EHCs on OEMs were always enabled by

regulation in each province, prior to 2013 the provincial Associations had chosen to exempt them. The Associations removed this exemption in 2013 to improve cost sharing among stewards remitting EHCs. Specifically, by 2013, lost OEM EHC income had become significant, program costs (including the cost of collecting the used oil and antifreeze products) were rising, and all program costs were being funded solely by non-OEM stewards. Levying of EHCs on OEMs ensured that all stewards who sell or import used oil, oil filters, container and antifreeze through any avenue paid their appropriate share. On average, OEMs contain approximately eight per cent of the recoverable used oil and filters, and up to 30 per cent of the antifreeze.

Stakeholder Consultation 2017

In 2013, that national UOMA committed to re-visiting the “Initial Fill (OEM) Category Summary, 2013” to ensure it remains interpretable and accurate, which you can find [here](#). The 2013 summary outlines the obligated original equipment and the quantity of oil, filters and antifreeze on which OEM stewards are required to remit EHCs. In 2017, its time to fulfil that commitment.

As a result, the national UOMA is asking members and OEM stewards to review the “Initial Fill (OEM) Category Summary, 2013” and provide feedback and data on the category listing and the associated initial fill quantities (i.e., volume of oil and antifreeze and number of filters). The following sections of this consultation document outline several amendments that could be considered. Additional recommendations (additions, deletions, merging of categories, definitions, quantities associated) are welcome.

In completing this consultation, the national UOMA aims to improve the Associations’ collective administrative efficiency, improve ease of interpretation for stewards, and improve EHC compliance. Its main objective is to clarify category classifications for some of the more difficult to classify on- and off-road vehicles and equipment. It also aims to avoid adding new OEM levies to vehicles or equipment that would increase administrative burden disproportionately to the funds collected.

Potential Amendments: Initial Fill (OEM) Category Summary, 2013

Over the past several years, the UOMA has collected feedback on the 2013 Summary from stewards and from our national EHC compliance auditor, as follows:

1. Clarify definitions to provide better direction to stewards and auditors on ‘what is EHC-applicable’, including:
 - a) Define the category that buses belong to.
 - b) Define the categories construction vehicles belong to (i.e., pavers, rock crushers, gravel screeners, fork lifts, cranes).
 - c) Define the difference between a residential and commercial riding mower.
 - d) Define the category crossover vehicles belong to, or create a new category that is more accurate.
2. Consider adding OEM levies to:
 - a) Motorbikes;
 - b) ATVs (including side-by-sides);
 - c) Snowmobiles;
 - d) Jet skis;
 - e) Boats;
 - f) Stationary engines; and
 - g) Oilfield pump jacks.
3. Consider merging categories in the “Construction Equipment” category.

The national UOMA has considered these suggestions, and it has also considered the feedback it received from its national member survey in which members clearly requested the UOMAs simplify EHC reporting. From these suggestions, the UOMAs have developed a **DRAFT Initial Fill (OEM) Summary Category, 2018** (Appendix 1) for your consideration and feedback.

Provide Your Feedback and Data

The following outlines the information and data the national UOMA is seeking to help inform its decision-making. Responses must be submitted in writing and be supported by verifiable data. In the absence of stakeholder feedback or sufficient stakeholder provided data, the Associations will base decision-making based on the best, readily available information.

Consultation questions

1. Please review the **DRAFT Initial Fill (OEM) Summary Category, 2018** (Appendix 1). Note, proposed clarifications and changes are highlighted; fill quantities are left blank for stakeholder input.

- a. Please provide your feedback regarding linking the classification of truck categories to the United States Department of Transportation's Federal Highway Administration 13 Class system.
 - b. Please provide your feedback on the appropriateness of adding crossover vehicles to the Light Duty Truck category.
 - c. Please provide data to support the appropriate fill quantities for Medium Duty Trucks.
 - d. Please provide your feedback regarding the appropriateness of exempting the application of EHCs to Riding Mowers & Utility Vehicles.
 - e. Please provide data to support the appropriate fill quantities for pavers, rock crushers, gravel screeners, fork lifts, cranes. The UOMAs will use this data to allocate this equipment to appropriate existing "Construction Equipment" sub-categories. (See question four below for further clarification.)
2. Please provide your feedback on the appropriateness of continuing to exempt the application of EHCs to the following vehicles:
 - a. Motorbikes;
 - b. ATVs (including side-by-sides);
 - c. Snowmobiles;
 - d. Jet skis; and
 - e. Boats.
3. Please provide your feedback on the appropriateness of applying EHCs to the following machinery, and provide data to support accurate EHCs:
 - a. Stationary engines; and
 - b. Oilfield pump jacks.
4. The UOMAs are working to simplify member EHC reporting, in general. One option to simplify reporting is to reduce the number of OEM reporting categories, where appropriate. To reduce the number of OEM reporting categories, please suggest options to merge sub-categories in the "Construction Equipment" category or any other major category, and please provide data to support your suggestions.

How to Submit Your Feedback

OEM stewards or associations should submit feedback to the national UOMA by email by **May 15, 2017**.

Consultation feedback may be provided in French or English, and should be made to the attention of:

Jodi Tomchyshyn London

Executive Director

AUOMA

jlondon@usedoilrecycling.ca

Jean Duchesneau

Assistant General Manager

SOGHU & SOGHUOMA

jean.duchesneau@soghu.ca

Questions on the consultation may be submitted in French or English to the attention of contacts listed above. The UOMA team may request a conference call with individual submitters to further understand the questions and feedback provided.

Next Steps: Timeline & Process

The national UOMA and the Associations aim for a transparent, accessible, and robust consultation. Please forward this consultation document, as necessary. All stakeholder feedback is welcome.

The consultation timelines are outlined below. Please note that the national UOMA and the Associations will provide formal notice of their decision to OEM stewards and members by September 2017 for implementation on January 1, 2018.

| Consultation & Amendment Process | Date |
|---|--------------------------|
| 1. Release consultation document. | March 15, 2017 |
| 2. Initial stakeholder consultation | March 15- May 15 2017 |
| 3. Assess consultation submissions/proposals, and draft summary of stakeholder input. | May 15 – June 2017 |
| 4. Release summary of stakeholder input | June 2017 |
| 5. Release Draft proposed updates to Initial (OEM) Fill Category Summary, 2013. | |
| 6. Final stakeholder consultation: 30-days. | June - July 2017 |
| 7. Assess final stakeholder input | August 2017 |
| 8. Finalize amendments to Initial (OEM) Fill Category Summary | |
| 9. Notify members of amendments | September 1, 2017 |
| 10. Implement Initial Fill (OEM) Summary Category, 2018 | January 1, 2018 |

Appendix 1: Proposed additions to Initial Fill (OEM) Category Summary

| DRAFT Initial Fill (OEM) Category Summary, 2018 | | | | | | |
|--|------------------|----------------------|----------------|---------------|---------------|--|
| Group Category | | | | | | |
| Description | Category or Size | Hydraulic & Lube Oil | Coolant Premix | Filters small | Filters large | Additional information |
| Automotive | | | | | | |
| Passenger Vehicles | | 13 | 8 | 2 | 0 | |
| Trucks - Heavy Duty | | 144 | 55 | 0 | 3 | Truck Class 7,8 |
| Trucks - Medium Duty | | TBC | TBC | TBC | TBC | Truck Class 4, 5, 6 |
| Trucks - Light Duty | | 18 | 10 | 2 | 0 | Truck Class 1, 2, 3 & Crossover vehicles |
| <i>Truck classifications based on United States Department of Transportation's Federal Highway Administration 13 Class system</i> | | | | | | |
| <i>Buses and any other vehicles that are not specifically identified are included in the appropriate weight class</i> | | | | | | |
| Electrical Equipment | | | | | | |
| Transformers and Capacitors | | | n.a | n.a | n.a | |
| <i>report actual volumes of oil used in the initial fill of all transformers and capacitors -- no EHC on these oils neither in Quebec nor in New Brunswick</i> | | | | | | |
| Riding Mowers & Utility Vehicles (4-cycle engines only) | | | | | | |
| Both commercial and residential use | | 13 | 4 | 1 | 0 | |
| <i>-Riding is defined as the operator either stands on a platform or sits on a seat</i> | | | | | | |
| <i>-Residential riding mowers are exempt</i> | | | | | | |
| Agriculture Equipment - following AEM category | | | | | | |
| Combine | FE23 | 178 | 69 | 1 | 4 | All sizes |
| Forage Harvesters | FE27 | 259 | 74 | 0 | 6 | All sizes |
| Sprayers | FESP | 224 | 32 | 3 | 1 | All sizes |
| Tractor | FE01-1 | 33 | 5 | 3 | 1 | PTO HP less than 40 HP |
| Tractor | FE01-2 | 69 | 16 | 3 | 1 | PTO HP between 40-100 HP |
| Tractor | FE01-3 | 132 | 31 | 3 | 2 | PTO HP greater than 100 HP |
| Tractor | FE22 | 436 | 52 | 0 | 6 | 4 wheel drive |
| Tractor | Tracks | 379 | 48 | 1 | 4 | All sizes |
| Wind Rowers | FEW3 | 113 | 29 | 3 | 1 | All sizes |
| Construction Equipment - following ISO 6165 | | | | | | |
| Dozer | Compact | 59 | 8 | 1 | 3 | less than 4500 kg |
| Dozer | Full size | 190 | 30 | 1 | 3 | greater than 4500 kg |
| Dumper | Compact | 130 | 92 | 1 | 2 | less than 4500 kg |
| Dumper | Full size | 420 | 369 | 2 | 2 | greater than 4500 kg |
| Excavator | Compact | 61 | 6 | 3 | 2 | less than 6000 kg |
| Excavator | Full size | 384 | 36 | 2 | 2 | greater than 6000 kg |
| Grader | Compact | 95 | 14 | 1 | 3 | less than 4500 kg |
| Grader | Full size | 308 | 56 | 1 | 3 | greater than 4500 kg |
| Horizontal Direction Drills | All | 123 | 63 | 2 | 2 | |
| Loader | Compact | 57 | 9 | 1 | 2 | less than 4500 kg |
| Loader | Full size | 184 | 36 | 3 | 2 | greater than 4500 kg |
| Pipe Layers | All | 366 | 65 | 0 | 5 | including rotating |
| Rollers | Full size | 120 | 21 | 4 | 0 | greater than 6000 kg |
| Rollers | Compact | 74 | 19 | 4 | 0 | less than 6000 kg |
| Scrapers | All | 871 | 528 | 0 | 6 | |
| Trenchers | Full size | 128 | 16 | 2 | 1 | greater than 3000 kgs |
| Trenchers | Compact | 73 | 0 | 2 | 1 | less than 3000 kgs |
| Trenchers | Portable | 33 | 10 | 1 | 0 | all walk behind & stand+ride behind |
| Pavers | | TBC | TBC | TBC | TBC | |
| Rock crushers | | TBC | TBC | TBC | TBC | |
| Gravel screeners | | TBC | TBC | TBC | TBC | |
| Fork Lifts | | TBC | TBC | TBC | TBC | |
| Cranes | | TBC | TBC | TBC | TBC | |

DRAFT Initial Fill (OEM) Category Summary, 2018 (continued)

| Group Category | | | | | | |
|---|-------------------------|---------------------------------|-----------------------|----------------------|----------------------|-------------------------------|
| Description | Category or Size | Hydraulic & Lube Oil | Coolant Premix | Filters small | Filters large | Additional information |
| Forestry Equipment | | | | | | |
| Attachments - Planting, Site Preparation | All | 65 | 15 | 1 | 1 | |
| Feller, Feller Bunchers | All | 368 | 35 | 2 | 1 | |
| Harvesters | All | 43 | 267 | 3 | 0 | |
| Log Loaders, Processors, Slashers | All | 398 | 26 | 3 | 1 | |
| Skidders | All | 162 | 29 | 4 | 3 | |
| Other | | | | | | |
| Stationary Engines | | TBC | TBC | TBC | TBC | |
| Oil Pump Jacks | | TBC | TBC | TBC | TBC | |
| <i>Report actual volumes of oil used in the initial fill of all stationary engines and oil pump jacks</i> | | | | | | |