



Canadian Petroleum Products Institute
Institut canadien des produits pétroliers

**FINAL PROCEEDINGS:
NATIONAL USED
OIL WORKSHOP
MONTREAL, QUEBEC
OCTOBER 22-24, 1991**

**ACTES DU
COLLOQUE NATIONAL
SUR LES HUILES USEES
MONTREAL (QUEBEC)
DU 22 AU 24 OCTOBRE 1991**



Canadian Petroleum Products Institute
Institut canadien des produits pétroliers

THE CANADIAN PETROLEUM PRODUCTS INSTITUTE

The Canadian Petroleum Products Institute (CPPI) was created in 1989 as a non-profit association of Canadian refiners and marketers of petroleum products.

The Institute today represents a membership of Canadian companies involved in one or more phases of the production of petroleum products - refining, transportation, marketing - which supplies domestic and industrial consumers with motor gasoline, heating oil, lubricants, and other essential petroleum-based products.

The CPPI's mission is to serve and represent the refining and marketing sectors of the petroleum industry with respect to environment, health and safety, and business issues.

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Les membres de l'Institut sont des sociétés canadiennes engagées dans différentes étapes de la production des produits pétroliers - le raffinage, le transport ou la commercialisation. Les consommateurs et les industries peuvent compter sur ces sociétés pour leur approvisionnement en essence pour moteurs, huile à chauffage, lubrifiants et autres dérivés essentiels du pétrole.

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PRESENTATIONS

CPPI NATIONAL USED OIL WORKSHOP COLLOQUE NATIONAL SUR LES HUILES USÉE DE L'ICPP

JIM RYAN

President, Canadian Tire Corporation Ltd.

Président, Société Canadian Tire Limitée

Good morning. On behalf of the members of the committee of the Canadian Petroleum Products Institute and the staff of the CPPI, it's a pleasure to welcome you to the National Used Oil Workshop. We appreciate and thank you for your interest and the overwhelming response to the workshop concept.

Today's agenda may be taxing on your anatomy, although the chairs look fairly comfortable. I would challenge everyone to become involved throughout the workshop and when you return to your jobs. Your experience and your thoughts and your insights are the critical components in making this workshop a success. I would also like to now be very candid and share with you some specific feelings and concerns of the CPPI Board, as we try to address the broader environmental issues raised by our customers and fellow citizens, and Claude will focus on the used oil initiatives. One of our critical concerns is the fundamental perception of how CPPI and its members function by the people who deal with us. While many of us involved with CPPI have been proactive on environmental, social and economic issues, we are sometimes perceived as coming from an industry that is rich, self interested, powerful and manipulative. At times, we are also perceived as being against regulation, always complaining about the cost of any changes, and somewhat naive about forces influencing public policy and unable to bring more than the lowest common denominator position to any discussion. Those are the good points.

We must refrain, as an industry, from being defensive. And instead, commit to continually working to earn a change in these perceptions. The only lasting way that we can do this, is if the members of our industry, individually and collectively, prove that we have value to add to the process of change that will make this a better country. We shouldn't expect the change in perceptions to come quickly and we will continually have to earn it. In support of improving our contribution in the environmental area, we need help. We believe there are two key areas which should be formally discussed by industry and government in a strategic standing forum, and appreciate the opportunity to put before you suggestions in these areas.

First, there is a need to clarify roles and responsibilities within the environmental action process, and then commit to work within that process. Second, industry and government must have a more clearly defined environmental improvement plan that is better understood by our joint customers, the Canadian public. Looking first at roles and responsibilities, we must respect that the government, as representatives of the people of Canada, must ultimately set the environmental agenda for our country.

We also understand that many of the environmental problems are very complex issues involving many industries and multi-levels of government. Well a great deal of data collection and analysis has been done by industries and governments, each working separately in order to set an environmental agenda that truly benefits Canadians. We believe there is a shared responsibility between industry and government to bring the mutual technical resources and skills to assessing the environmental risks we face, determining their cause, the current magnitude of the risk and the potential consequences over time, and then put forward solutions that are technically feasible to correct them; currently, in the near term and in the long term. We must help to clarify, as best we can, the potential impact of corrective action on consumers, government and industry. And based on above information, put forward recommended priorities fully recognizing that the decision on finalizing priorities rest with the government. We also share a responsibility to avoid focusing potentially limited technical and economic resources on projects with low pay out. In other words, avoid projects that will have little impact on improving the environment, high risk of success, and more importantly divert resources from achieving substantial environmental improvement within our lives. During the establishment of priorities, and once the priorities are established, we share a responsibility for leadership.

Within our industry, and amongst other industries with who we share problems and opportunities, we must be open-minded and fair in our perspectives on defining risks and the actual costs of corrective action. The renewed initiative for more continuous dialogue by CPPI with the Motor Vehicle Manufactures Association is an example of what can be done. We jointly have a responsibility to cut through the bureaucracy in both industry and government. We have a responsibility to develop trusting relationships that will allow us to speak more candidly with each other, and we must find better ways to communicate with our joint customer, the Canadian public. We must help them better understand the environmental agenda and how it was developed. Industry must be prepared to try more pilot environmental projects and both industry and government must not always seek to go for the home run, the ultimate solution to complex problems. Together, we must practice what we preach. Together we should set examples as environmentally conscious Canadians. And as an example with regard to used oil, industry and government should be prepared to specify products containing rerefined oil in appropriate applications within our own operations. Collecting the used oil is only half of a viable environmental and economic solution to the problem.

I put this before you as recommendations for action and suggestions. A clarification of roles and responsibilities, a commitment to a process of developing well thought out priorities and then communicating those priorities. With a clear understanding and involvement in developing Canada's long term environmental objectives, and a focus on and commitment to achievable priorities within those objectives, both industry and government can better plan for the future.

We can make it happen if our leaders commit us to making it happen. I believe working together for the benefit of our mutual customers, the citizens of Canada, and sharing in the development of a long term environmental plan, should make us a stronger country. Some of our economic competitors in the world are already doing it. Within this room, we have the experience, and the technical talent from very broad sectors of industry and government. Together we can make a difference. Within this specific initiative, let's set an example of planning and working together. Let's not let our customers, our employers or ourselves down. Thank you very much!

CLAUDE BROUILLARD

President, Canadian Petroleum Products Institute

Président, Institut canadien des produits pétroliers

Merci René. Mesdames et messieurs, comme vous l'avez entendu de la bouche de René, vous êtes venus en grand nombre de tous les coins du pays. Cela prouve, à mon avis, qu'il est possible que la qualité côtoie la quantité. Vous êtes aussi représentatifs de la grande majorité des secteurs intéressés à la résolution du problème des huiles usées, ce qui augure très bien pour le succès de ce colloque. Je m'en voudrais de ne pas mentionner la part incroyable de René Miglierina, grand responsable de l'organisation du colloque, ainsi que de son équipe, qui s'est fixé comme premier objectif votre mieux-être et votre confort.

Jim Ryan vous a parlé des besoins de communication entre tous les intervenants. Il a aussi mentionné le besoin d'identifier les vrais problèmes, d'établir les priorités, et d'identifier les critères qui nous permettraient de faire des choix. En fin de compte, c'est la raison pour laquelle nous sommes ici aujourd'hui. C'est tous ensemble que nous réussirons à faire des choix qui seront acceptables pour la majorité d'entre nous.

Je crois que la résolution des huiles usées et la façon que ce colloque a été organisé répond à la grande majorité des critères que Jim a identifiés. Afin que nous partions du même pied, et que nous partagions les mêmes concepts, la même compréhension et les problèmes et solutions possibles, je me propose de vous entretenir ce matin, de l'évolution du dossier à ce jour. De vous faire une courte description du plan de l'Institut et de vous fournir ou de vous suggérer quelques points qui pourraient être débattus dans vos discussions régionales.

Just to make sure that we're all on the same footing, what I plan to do this morning in as few minutes as possible, is to review with you the history of the used oil issue, to describe the CPPI Used Oil Plan, and offer a few suggestions for your regional workshop. But before doing that, it gives me a great deal of pleasure and satisfaction to share with you a letter that I have just received from the Federal Minister of the Environment, the Honourable Jean Charest. First of all, he expresses his wish that he should have been with us today, but other priorities imposed on him by the Prime Minister, have made it impossible for him to join us. I will not read the whole letter because I will have copies of it for your kits before you depart. But let me quote a couple of paragraphs. "It gives me great satisfaction therefore to see the Used Oil Action Plan that your Institute recently developed and that my colleagues and I, of the Canadian Council of Ministers of the Environment, have endorsed. I congratulate you also on being the first group to accept responsibility for the post consumer fate of waste generated by your industry". He goes on to say "Cooperation

between governments and industry to solve environmental problems is a Green Plan objective. Your work to develop and implement a used oil action plan is an outstanding contribution to that objective". That, ladies and gentlemen, I believe sends us hopefully in the right direction knowing that we have political support for whatever solution we come up with and agree to today.

What is the problem of used oil? Very basically, there's a billion litres of lube oil sold every year. About five hundred million (500,000,000) litres of this is consumed, two hundred and fifty million (250,000,000) is collected and there remains about two hundred and fifty million (250,000,000) litres which disappear, we suspect, into the environment. Lube oil sold to industry, I should say, accounts for about eighty percent (80%) of lube oil sales. About twenty percent (20%) of total lube oil sales go to the do-it-yourself market. The industrial users are made up essentially of trucking companies, taxi fleets, service stations and every industry. In the main, they have developed their own collection system and have found ways to dispose of the collected used oil. The do-it-yourself consumers are the people that like to change their own oil in their own car, farm equipment, and other machinery. The problem is that this used oil is not collected. We all know that used oil can contaminate the environment. It can affect groundwater. Throughout this country, in every part of Canada, we do depend on groundwater for drinking purposes. One single litre of oil can contaminate up to one million litres of water. So therefore, it's not surprising that many communities are interested in this issue.

But what is used oil? I propose a definition to you. Used oil can be oil that has been used for lubricating or other purposes and which has become unsuitable for its original use, either because of the presence of impurities or because of the loss of its original properties. Remember, one litre of used oil contains about one third (1/3) waste water and metals, and about two thirds (2/3) hydrocarbons.

Laissez-moi partager avec vous un peu d'histoire. Il y a un peu plus de deux ans, le ministre fédéral de l'Environnement, l'Honorable Lucien Bouchard, lançait un défi à l'Institut. Il lui suggérait que peut-être les huiles usées seraient un projet digne d'être attaqué et résolu. Le conseil d'administration de l'Institut releva le défi. Il établit un groupe de travail chargé d'étudier le problème et d'amener des recommandations. Une étude fut commandée à Monenco qui étudia les différentes options qui pourraient s'offrir à l'industrie. Et l'industrie, l'Institut plutôt, à ce moment-là eut l'immense chance et avantage de pouvoir amener sur le terrain si je peux dire, une personne, un expert dans le domaine, en la personne de Tony Wenzler, que vous connaissez tous sûrement. Il a fait un travail colossal de rencontrer tous les gouvernements provinciaux et fédéraux, de discuter avec la plupart des intervenants et des intéressés et il a fait bouger le dossier. Je crois que si nous sommes ici aujourd'hui nous le devons beaucoup à Tony et à ses efforts. Et je pense aussi qu'à la suite de ce colloque nous aurons encore un peu de boulot pour Tony.

Alors, les principes que vous voyez sur l'écran furent adoptés par l'Institut. Il furent immédiatement communiqués au Conseil des ministres de l'environnement. Chaque membre du conseil d'administration de l'Institut rencontra individuellement les ministres et les hauts fonctionnaires des gouvernements provinciaux. Tony établit des comités nationaux et provinciaux et c'est ainsi que nous en sommes arrivés au point où nous en sommes en ce moment. Le principe numéro un, je crois, ne demande pas d'explications. Nous croyons fermement dans ce domaine, comme dans d'autres secteurs, que si nous sommes partie du problème, nous devons faire partie de la solution.

Principle number two is an interesting one. I don't mind sharing with you the passionate, and I do mean passionate, debate within the members of our Board. There were two camps, and the first said that we have a challenge, let's meet it quickly, let's satisfy the Minister and it will go away. The others said; "Whoa!", hold on a minute. Let's take a realistic approach so that we don't end up with a larger problem than we started with. The fear of course was that collecting the used oil is not the end of the problem. Disposing of it is equally an issue, and unless we have a way of disposing of it, we risk stockpiling it and developing lakes of waste.

The options that were identified were basically three types. First of all, recycle the hydrocarbon content. That can be virgin lube oil replacement or virgin crude replacement or feedstock for downstream industries. Second option, of course can be for its energy content or alternative fuel. Cement kilns, boilers or other thermal applications spring to mind. The third one, is to treat used oil as waste and dispose of it as such. Road oiling, land application, landfill, sewer, and incineration, are some of these methods. Needless to say, the Institute endorses only the first two options. Principle number three, very key, is an important principle in a market economy. The solutions, whatever solutions we come up with, can be expensive, and we do believe that there should be no free ride. So what we are saying is that if you sell lube oil you must somehow be part of a system that takes back used oil. Principle number four, of course means that all parties must participate in this exercise. The industry, the consumer, and government. Government has a role, a very important role if only to make sure that principles two and three are established and adhered to.

These four principles guided the first solution, as developed by CPPI. This was basically a two prong approach. One, that said industrial users have already existing customer supplier agreements to collect used oil and to dispose of it. So, CPPI decided to focus on the do-it-yourselfer. It proposed a plan, which with the benefit of hind-sight now, and after extensive consultation we realized was complex and difficult. But basically, it suggested government run a collection authority, and where it existed, base it on the blue box. It suggested that the capital cost be shared equally one third, one third, one third between government, industry and municipalities. The operating cost would be borne by the government. And because governments are strapped for cash, the Institute suggested that a special tax or levy be imposed at the regional level to provide the government funds required. Well, you all know that this plan met with very strong resistance, and for good reasons. Politicians do not like to impose new taxes. Our friends in the public service said if a tax is collected it may

not end up where you would like it to be. It may go into general revenue and not serve the purpose for which it was established. Retailers thought that this would distort the market. And another argument was that the establishment of a collection authority would establish a bureaucracy that we did not need. So CPPI went back to the drafting table. We believe we've learned from the exercise, from the consultation. We now have, I believe, the new approach, which reflects a major consensus. Of all the people involved in lube sale, ninety five percent (95%) by volume agree with the plan that I will outline to you now.

It's much simpler, more elegant. No tax. No collection authority. No bureaucracy. Market forces define the solutions. But most important of all, all parties are involved. The same principles that I've outlined earlier apply to the old approach as well as to this one. We believe that the industrial sector system works well. And therefore we don't propose to touch it. We focused on the do-it-yourselfer market. There is a role for each player. The players, as far as we are concerned, are the sellers, the users, and the government. I will examine each one in turn in a little bit more detail.

The seller has a responsibility to be part of a system that will offer the capability of receiving waste oil. It does not mean that each seller must have a tank to receive used oil in his or her store or wherever. It does mean though that they have to be part of a system. Either by providing a receptacle or by entering into an agreement with their supplier, or through third party agreement. So something has got to be in place.

The second point is that we believe that purchasers of lube oil must be provided with a convenient way of assuming their responsibility. Now that'll be an interesting point in the regional workshops - to try to define "what is a convenient way?". We believe that most Canadians are very conscious of the environment and therefore want to do the right thing. And they will do so if we make it a little easier for them. Convenience is one of those. The other one of course is to provide them with adequate information. I suppose few Canadians are aware of the value of used oil - its high hydrocarbon content. They may not be aware that they should not mix contaminants with used oil. That message needs to be told. They may think that "solvents, paints, what the heck, its all the same thing, we'll put it together and bring it to receptacle 'A'". They must be told not to do so. They must be told that this is not a method to get rid of their own hazardous waste. So there is a message that needs to be given to the user and we all have a responsibility in doing so.

Governments also have a role. Perhaps "referee", is a good way to describe it. Governments by and large have a responsibility to protect our health and our welfare as well as that of the environment. We're asking government to do what they do best - draft regulations, pass legislation. We'd like them, in each of their jurisdictions, to approve the options that they think are desirable. But, we insist that these options must be in place before collection starts.

Some of the criteria for the selection of these options are self evident. I'll identify some of them. In trying to analyze which option should be retained by government we should keep in mind the economic value of used oil, the technological capability, the environmental and health risks, sustainable development principles, the political acceptability and the availability of options, which will vary from region to region whether we're east, west, north, south. And finally the social-economic benefits. We're also asking governments to protect the collectors. Some people may bring back contaminants either by accident or wilfully. We, in CPPI believe that the collector should not be victimized. So we're asking government to look at this, try to protect the collectors or the very least make sure that when an accident does happen, that when a batch of contaminated used oil does occur, that there's a way of disposing of it without undue penalty.

Finally, the level playing field that I have already mentioned. It's very important that the good corporate citizens, those that are willing to assume their responsibilities, not be penalized by their actions. So everyone must be treated the same. Basically, what we are advocating is, if you sell lube oil you must be part of a system that will allow its collection and ultimate disposal.

A few thoughts for your discussions in regional workshops. I would like you to consider a certain number of objectives. Ideally, each workshop should be able to develop objectives for regulatory requirements. And again, hopefully at the end, there ought to be a certain amount of consistency between the four workshops. It would be very nice, indeed it would be very useful, if we could send a very strong message to the next meeting of the Canadian Council of Ministers of the Environment that will be meeting in November, in Halifax. And as you heard from Minister Charest, and I had the same comment made to me by the present Chairman of CCME, they are interested in our workshop. They're looking forward to an output and I think we can count on their support.

Some of the things that you may wish to consider in your workshop are: What are the acceptable disposal options? How can we protect the collectors? What kind of public information is required or needed? Do we need licensing of collectors or sellers?

The second objective I'd like to suggest is to try to establish a concrete plan of action. In other words, when we leave here we should have a fairly good idea of what needs to be done, by what time-frame, and by whom. Also, I'd like to suggest that perhaps a public awareness program is a pretty vital part of any solution we may wish to develop. It would be useful if we could have a clearer understanding of the role of each player - companies, consumer, government, associations and so on.

Finally, I hope we can agree on one objective. I would hope that this is the last workshop we ever have on used oil. We will have been so successful that it will be resolved. There should not be any other need for such exercises.

And one last piece of information - in your kits you have three backgrounders, one that defines the problem, another one that outlines the CPPI Used Oil Plan and a third one that identifies the various recycle options and identifies the criteria. You may find these useful in your discussions. And as you go forward, to debate these issues in the regional workshops, please remember that "We're OIL in this together"! Thank you very much!

ROBERT DARBELNET

President and General Manager, CAA - Quebec

Président-directeur général, CAA - Québec

Thank you René. René and I both have something in common, and that is that we have a name which is very difficult to pronounce. Actually, I'm always a little surprised when someone can correctly pronounce my name, and my family has been pressuring me to consider changing our name to something that would be easier. They suggested that perhaps Hilton would be a nice name. Not only would everyone be able to pronounce it but it would also match all those towels we have at home. I gather you have some of those towels too.

It was with great pleasure that I accepted the invitation of l'ICPP, de vous présenter notre point de vue à l'égard de la question des huiles usées. Tout d'abord, quelques mots sur le CAA-Québec. Organisme sans but lucratif créé en 1904, le club regroupe aujourd'hui plus de cinq cent quatre-vingt milles (580 000) membres au Québec et de ce fait il constitue le plus important regroupement québécois de consommateurs. Notre mission est d'offrir à nos membres automobilistes, voyageurs et consommateurs, des services de haute qualité afin d'assurer leur sécurité et de faciliter leur mobilité; le tout en harmonie avec l'environnement. Grâce à ses affiliations, le club compte plusieurs partenaires à l'échelle mondiale. Les fédérations auxquelles nous appartenons compte plus d'une centaine de clubs ayant au total soixante dix millions (70 000 000) de membres dont au-delà de trois millions (3 000 000) au Canada, et près de trente trois millions (33 000 000) en Amérique du Nord.

Comme vous le savez, on m'a demandé de vous faire part du point de vue des consommateurs à l'égard de la question des huiles usées. Bien que nous ayons une relation privilégiée avec nos membres automobilistes, il serait un peu hasardeux d'affirmer que nous sommes autorisés à parler en leur nom. Même nos élus de la scène politique ne peuvent pas prétendre exprimer le point de vue des électeurs puisque les multiples sondages de la vie moderne indiquent clairement que l'électorat, sur bien des questions, est divisé. Néanmoins, je prends le risque de vous faire trois observations, de vous soumettre trois constats.

Le premier concerne l'attitude des automobilistes à l'égard de l'environnement. Sur ce continent, la quasi-totalité des adultes sont détenteurs d'un permis de conduire et une énorme majorité d'entre eux possèdent, seul ou avec un conjoint, une voiture. Conséquemment, l'automobiliste nord-américain c'est vous, c'est moi, c'est presque tout le monde et on aurait tort de chercher à le dissocier de la population en général. Qu'on le veuille ou non, les reproches que l'on pourrait faire aux automobilistes, c'est à la société en général qu'ils s'adressent. En ce qui a trait à leur attitude, il ne demande pas mieux que de collaborer à la protection de l'environnement pourvu qu'on leur fournisse la possibilité de le faire.

En matière d'huiles usées, il y a deux catégories distinctes d'automobilistes. Ceux qui confient les changements d'huile à leur garagiste et ceux qui la changent eux-mêmes. Les premiers ne sont pas vraiment en cause. Leurs garagistes le sont par contre et c'est cet aspect de la question qui sera vraisemblablement traité par ceux qui me suivent. Les seconds, bricoleurs du samedi pour la plupart, sont directement concernés par la disposition des huiles usées. Ils nous témoignent quotidiennement leurs préoccupations à cet égard, par ces centaines d'appels téléphoniques que nous recevons. Leur question est claire : "Comment s'en débarrasser?" La réponse est regrettamment claire elle aussi : "Ne la jetez surtout pas". Certes, nous trouvons désolant le fait qui y ait des particuliers qui se débarrassent inadéquatement des huiles usées. Mais finalement, à bien y penser, ce comportement de prime abord délinquant, est bien plus dicté par un manque d'information et surtout par l'absence flagrante d'un système organisé de gestion des déchets.

Pour bien comprendre ce que vivent les automobilistes qui nous consultent, imaginez vous un instant qu'à l'instar de ces derniers vous décidiez aujourd'hui vous, automobilistes bricoleurs, de faire la vidange d'huile de votre voiture. Votre budget est serré et cet entretien fondamental ne cause pas de problèmes pour vous. C'est en fait votre façon d'économiser. D'après ce qu'on dit à la télévision ou ailleurs, il ne faut plus jeter l'huile au bout du grand champ où vous alliez à ce jour. Donc, vous vous renseignez et partout la réponse est à peu près la même; "Ne la jetez pas. Attendez une prochaine collecte municipale de déchets dangereux ou encore essayez de prendre entente avec le garagiste du coin". Du coup, vous voilà devant tout le problème qui nous réunit ici aujourd'hui. Vous avez dans vos mains, ou dans un contenant j'espère, ces huiles déclarées anti-écologiques. Vous êtes coincé entre votre garagiste qui lui, ne veut pas les reprendre parce qu'il doit payer pour s'en débarrasser et la ville qui elle, ne fait sa prochaine cueillette, si cueillette il y a, que dans je ne sais combien de mois. Bon, que faites-vous? Vous gardez vos quatre litres d'huile usée et tous les autres quatre litres d'huile usée à venir dans votre remise ou encore au sous-sol et vous espérez que le dossier débloque. Ou encore vous vous dites, comme peut-être bien des gens, qu'après tout ce n'est pas un petit quatre litres d'huile par ici, quatre litres d'huile par là qui va tuer ma planète. Du coup, vous voilà dans le clan de ce que certains n'hésiteraient pas à qualifier de criminel de l'environnement. Alors, n'êtes-vous pas en fait les victimes de ce manque de système intégré de gestion des huiles usées? Bref, premier constat, c'est bien plus le manque de moyen que le manque de volonté qui est en cause.

Le deuxième constat que je sou mets à votre considération concerne précisément ces moyens, ce réseau que l'automobiliste bricoleur attend. Les gens qui sont dans cette salle ce matin, et les instances que vous représentez, seront les architectes du réseau en question. Nous pourrons en garantir l'échec tout simplement en le concevant en fonction de nos besoins. Par ailleurs, pour en assurer le succès nous devons le concevoir en fonction des besoins des usagers. Rappelons-nous ce commentaire de René tout à l'heure : "La nourriture de chats, c'est pour les chats". Cela peut paraître simpliste comme observation mais par expérience, nous savons tous que ce piège est grand. Le consommateur aura besoin d'incitatifs d'ordre pratique. Ainsi les points de dépôt devront être nombreux, accessibles, et ouverts à des heures

où l'usager est le plus susceptible d'avoir à s'en servir. Comme les soirs ou les fins de semaine, par exemple. On devrait également penser à rendre disponibles des contenants pratiques, tant pour recueillir les huiles que pour les déverser au point de cueillette. Et puis, il ne faut pas oublier le filtre à huile que l'on vient de changer et qui contient lui aussi une quantité non négligeable d'huile usée. L'automobiliste cherchera sans doute à en disposer et là aussi il faut lui faciliter la tâche.

Je sais que nous allons devoir parler du financement de ce réseau. Avant que quelqu'un prononce de nouveau le mot magique des dirigeants en panne de revenus, vous avez compris que je fais allusion ici à un mot qui est largement surutilisé ces temps-ci et qui est le mot "taxe". Je vous propose plutôt le mot "consigne". Nous croyons qu'une consigne s'avère la solution la plus appropriée puisqu'elle récompenserait le comportement écologique des consommateurs, contraignant d'autant les délinquants à assumer les coûts du non-retour des huiles usées. Nous désirons rappeler ici de façon claire et sans équivoque que les automobilistes n'accepterons jamais de payer une taxe supplémentaire pour défrayer le financement de la gestion des huiles usées.

Le CAA-Québec considère que les automobilistes payent déjà plus que leur part en matière de taxes et bien peu des sommes qu'ils versent sont réaffectées à des services auxquels ils seraient pourtant en mesure de s'attendre. Selon les données de notre plus récente étude sur les coûts reliés à l'utilisation d'une voiture, l'automobiliste propriétaire d'une voiture neuve paye l'équivalent de cent quinze dollars (115 \$) chaque mois en taxes diverses. Par ailleurs, même en matière de consigne, il faut être prudent. Rappelons-nous par exemple, cette consigne de cinq dollars (5 \$) sur les pneus imposée par un gouvernement voisin. L'expérience semble démontrer aujourd'hui que les sommes ainsi recueillies ont à ce jour surtout aidé le fond consolidé de la province en question, plutôt que de servir à ce pourquoi la consigne avait été instaurée. En juin dernier, cette consigne avait déjà rapporté cent millions de dollars, tandis qu'on nous indique qu'à peine dix pour cent (10 %) de cette somme a été affecté à la gestion des pneus usés. Cette même consigne est par ailleurs, majorée d'un montant de deux dollars exigé des détaillants de pneus pour disposer des vieilles carcasses, puis elle est soumise aux taxes fédérales et provinciales. Ainsi ce n'est plus cinq dollars que le consommateur paye à l'achat d'un pneu mais bien un montant qui est supérieur à huit dollars. Et pendant ce temps, c'est surtout l'État qui profite de ces argents tandis que le problème lui, n'est toujours pas réglé.

Bref, ce réseau qu'attend l'automobiliste, devra être conçu en fonction de ses besoins et non des nôtres. De plus, quand nous choisirons le lubrifiant financier qui en assurera le bon fonctionnement, évitons la taxe car ce serait comme jeter du sable dans l'engrenage.

Enfin, le troisième et dernier constat que je sou mets à votre considération, c'est que le temps sera bientôt venu d'agir. Bien sûr si nous le voulons, nous pourrons trouver toutes les raisons de ne pas aller de l'avant. Les gouvernements pourraient attendre que les intervenants que nous sommes, se prennent en main tout de moins, se concertent. Les différents intervenants pourraient attendre que les autorités gouvernementales tranchent. Ou encore, nous pourrions tous attendre qu'une autre génération règle la question. Sans vouloir être cynique, il faut admettre que c'est un réflexe qui ne nous est pas entièrement étranger. Je crois cependant qu'au terme du présent colloque, nous pourrons affirmer qu'à peu près tout ce qui doit être dit sur les huiles usées aura été dit. Qu'à peu près tout ce qui doit être étudié, aura été étudié. Et tout ce qui doit être écrit aura été écrit. Selon moi, et j'espère pour plusieurs d'entre vous, l'heure n'est plus aux discussions mais à l'action. Nous pouvons souhaiter que ce colloque devienne une amorce bien concrète en ce sens.

Chacune des personnes dans cette salle représente d'ailleurs un des maillons essentiels à la chaîne qu'il nous faut rapidement unifier. Pour certains, la solution sera peut-être de sensibiliser et immobiliser au plus vite, le grand public par rapport à ce problème. Et à ce chapitre, le CAA-Québec entend bien faire sa part. Mais même s'ils sont bien informés, les consommateurs constateront que leurs efforts sont vains s'ils ne disposent pas d'un réseau de collecte efficace. Et à quoi bon instaurer un réseau de collecte si il n'y a pas de structure appropriée de transport et d'entreposage qui le supporte? À quoi bon faire tous ces efforts si aucun contrôle n'est fait des huiles recueillies? À quoi bon motiver les consommateurs si en bout de ligne, personne n'est intéressé ou n'est autorisé à recycler, à réutiliser, ou à éliminer écologiquement les huiles usées? Il nous faut d'abord régler ces grandes questions.

J'ai passé en revue la liste des participants qui sont présents ici aujourd'hui. Il n'y a aucun doute que l'ICPP a su réunir toutes les personnes, et toutes les instances, qui sont concernées par cette question. Je l'en félicite, M. Miglierina en tête. Il ne reste qu'à voir si la volonté d'agir est au rendez-vous.

Enfin, au CAA-Québec, nous sommes persuadés que l'automobiliste est un citoyen tout aussi conscient des conséquences de ses actes au chapitre de l'environnement qu'un de ces rares citoyens qui lui n'aurait ni permis de conduire, ni voiture. L'automobile est pour une majorité de citoyens, le seul moyen de transport efficace dont il dispose pour ses déplacements. L'automobiliste fait déjà financièrement plus que sa part pour la société. Selon nous, l'automobiliste est prêt à assumer davantage de responsabilités, comme par exemple, ramener sa vieille huile moteur à un point de collecte. Nous constatons quotidiennement qu'une sérieuse motivation anime de plus en plus de nos membres par rapport à l'environnement. Cela nous laisse d'ailleurs penser qu'ils seraient prêts aussi à assumer leurs responsabilités par rapport à d'autres polluants automobiles comme les batteries et les pneus. Ces efforts seront inutiles cependant, s'ils ne s'intègrent pas à ceux des gouvernements, des industries, de toute la société.

Pour le CAA-Québec, et je termine là-dessus, l'automobile fait peut-être partie du problème, mais l'automobiliste fait définitivement partie de la solution. Je vous remercie!

BILL DEMPSEY

Vice-President and General Manager

Vice-président et directeur général

Valvoline Canada

Thanks again Tony. It's interesting when you sit back and see the cartoons and the articles about business people. They paint us as being selfish, money hungry, relentless people who don't care about the environment, and would probably sell their grandmothers and her favourite tree for just a nickel. It's a shame because it's certainly not true. We, as any cross section of career people, have our good and bad. But for the largest percentage we want to build a world that our children, grandchildren and great-grandchildren can inherit. In order to do this, we realize the environment that we live in must be protected and we must do everything in our power to ensure it is cleaned up for the next generation to live in. However, I'm not here today to lecture you on how concerned and responsible business people really are, I'm here today to speak to you about used motor oil from a wholesalers' perspective. And no, Valvoline is not a wholesaler. We are a Canadian manufacturer with blow-moulding, blending, packaging facilities in Mississauga, Ontario. We've just celebrated our hundred and twenty fifth anniversary since the Valvoline trademark was first registered and have been in Canada for over sixty years. We're proud to be a Canadian manufacturer run by Canadian management but also have the access to draw on the experience of a hundred and thirty nine countries that we're established in. We sell to all market segments, industrial accounts, mass merchandisers and one of the largest segments, the automotive wholesale distribution network that services the automotive after market. The automotive after market is a multi-billion-dollar industry with small, medium and large companies manufacturing and distributing automotive replacement parts, accessories, tools and equipment to the service trade to keep Canada's fifteen million vehicles on the road. The after market industry employs, directly or indirectly, three hundred and fifty thousand Canadians in parts production, distribution, wholesaling and service at vehicle repair shops and motor vehicle dealer, service stations and others.

Whichever segment you look at, all to some extent deal with motor oils. And as an important marketing tool for them, after-market companies will annually distribute over one hundred million litres of motor oil to installers and to users. The Automotive Industry Association or AIA, of Canada is the national trade association representing wholesalers, warehouse distributors, manufacturers, re-builders, national distributors, buying groups and machine shops. AIA is very active in government relations, market research, public relations, education, training and other activities important to all participants in the after-market. AIA is also active with the Canadian Council of Ministers of the Environment. And as a member of AIA, as a member of the AIA environmental group, it is my responsibility to keep AIA members informed on government initiatives and environmental legislation that may affect the after-market industry.

AIA has taken it upon themselves as an industry to conduct surveys of all their members to get an opinion of where they stand on the disposal of different waste products which includes used motor oil. A draft of this survey will be out within the next few days and I'm sure we'll be pleased to share it with anybody who's interested in reviewing it.

About a year and a half ago I became involved with the CPPI when they approached Valvoline with their draft of a report that they were presenting to the different ministries on the collection of used motor oil. We agreed with the concept and we applaud CPPI for being pro-active in such an important area. However, we did not agree on their recommendations of how the program would work. Since we are not members of CPPI, we took upon ourselves, as an independent oil producer, to communicate to all provincial ministers our disagreement. We finally did come to an agreement with the CPPI on what we consider to be not only an acceptable proposal but a proposal that will work well for all concerned, both independent producers and the CPPI members.

The CPPI plan works well for three reasons. First, it puts the cost and the responsibility of the collection of used motor oil on the industry that profits from its sales. Second, it maintains an even playing field and does not discriminate against the independent motor oil companies such as Valvoline as compared to some of the majors and other members of CPPI. Third, there is little legislation required to implement and no new tax to levy. More important however, there's an opportunity in all this. The opportunity is for the motor oil producers, marketers and retailers to implement proven programs that directly benefit the environment which will only enhance their image in the market place and create new sales opportunity.

Before a program like this will work however, there are some obstacles that must be overcome. First of all, it is very important that we have all the provinces going down the same road together, with similar legislation to ensure that we can put together cost effective national used oil collection programs. Businesses, like environmental issues, transcend all the provincial boundaries. If each one of the provinces decides to go its own way with different legislation, we lose the cost effectiveness of the program. And if we lose the cost effectiveness of a program, we lose the opportunity to collect the percentage of used motor oil we would all like to see. It is also extremely important for the success of any used oil collection program that used motor oil not be designated as a hazardous waste product. In fact, the classification of waste is certainly not appropriate because used motor oil is a resource. It's certainly not a waste. It is a resource that can be reused. It can be burned off for energy and there reducing the use of other fuels. The hazardous designation would only discourage participation at all levels of collection and reuse. In fact, it was interesting because last night I had a conversation with some people from the United States. The State of New Jersey, at this time, is looking at rescinding their original designation of used oil as a hazardous waste. Because they are not collecting the percentage of used oil that they would like to, they are now looking at rescinding the hazardous waste designation and creating another classification for it. The province of Manitoba's Waste Reduction and Prevention

Report on used motor oil which was issued in April of 1991, has recognized this and has designated used oil as a special waste and therefore not impeding any of the collection efforts. I still have a little bit of trouble with the terminology waste because used motor oil is not a waste. But it is still a step in the right direction.

There's also the liability issue. If contaminated oil is dumped in the used oil collection facility, who becomes responsible for the cost of this contaminated oil. We, in industry, know that if it is used motor oil that is being returned, there is no reason for the motor oil to be contaminated. The contamination that would appear in any of these containers is coming from other industries such as the chemical industry, the paint industry, or other areas that are not generated by the motor oil manufacturers. There is also existing legislation in some provinces, that at the present time, restrict proper disposal of used motor oil. These barriers must be removed to effectively handle all the used motor oil collected.

We at Valvoline, have been very pro-active in developing alternatives and have a program that we'd be more than pleased to show you if the time permitted, that would enable every retailer and everyone of our customers to be in the do-it-yourself oil collection business immediately. In discussion with all our customers they are very anxious to put a program like this into place and yet we need your help. We need your help in ensuring that everyone that is selling motor oil will be as responsible as we are and make the effort to have the do-it-yourselfers return used motor oil. Our collection program is all encompassing and would show the retailer or distributor from point "A" to point "Z" exactly how to collect these motor oils, how to market the program and how to capitalize on the opportunity and create more business for himself.

The last and most important issue, that I'd like to close with, is in regards to regulations or legislation. At the present time, only the province of B.C. and the province of Manitoba have draft regulations out now. We commend both provinces for doing this, and also encourage the other provinces to get on board as quickly as possible. It is very difficult for national companies to put together ten to twelve different programs that are intended to achieve the same objective. We must have national programs for cost effectiveness and most important to facilitate the proper collection of used motor oil and reduce the current on-going damage to our environment. We are ready to act now but we need your help. Thank you very much!

MARKUS WEINBRECHT

Buyer, Canadian Tire Corporation Ltd.

Acheteur, société Canadian Tire Limitée

Thank you Tony. Good morning, bonjour, and thank you for the opportunity to present a retailers perspective on the CPPI National Used Oil Plan. I'd like to begin by commending the CPPI for the way they handled the development of the used oil plan being discussed here today. Many of us have been involved in the used oil discussions from day one and have seen the plan evolve from one that began with very little support from the stakeholder group to a plan that we now feel is the most effective option, the least cost to the end consumer and one that maintains an equal playing field for all competitors in the industry.

Imagine if you will, putting twenty individuals in one room, from different oil companies, retailers, and other interest groups, all with different motives and agendas, and all trying to come to agreement on an issue as complex and sensitive as used oil disposal. It wasn't an easy task and I must say that the discussions became quite heated at times. But the end result is a plan that has very wide acceptance from the industry. Canadian Tire fully supports CPPI Used Oil Plan for a number of reasons. As a motor oil retailer to the do-it-yourself consumer, we have contributed to the used oil problem. Basically, the criterion criteria we used in developing the plan was that it had to be easy for customers to bring back the used motor oil. The thousands of motor oil retailers across Canada would provide a multitude of convenient, accessible locations for customers to bring their used motor oil back to. The used oil plan would also be the least cost to the end consumer. The collection infrastructure of the used oil tanks, people and facilities, are for the most part already in place, therefore requiring only minimal additional expenditures to set up a national collection system.

The retailer of motor oil would ultimately bear the cost of handling and disposal of used oil. The used oils' disposal costs would then be built into the retail selling price of motor oil where market forces would ensure that the disposal cost would be fair and the lowest cost to all customers. This is a much more economical and preferred option to the alternative of a retail motor oil tax. The administration of a tax would certainly create extra work for retailers as well as causing further anguish to consumers who are presently already feeling over-taxed. Keeping the cost of motor oil down is also critical in minimizing cross-border shopping to the U.S., a problem I'm sure many of you retailers are already facing. During these difficult economic times, we felt strongly that any proposed program should ensure that the end consumer's dollar was being most wisely spent. We feel confident that the CPPI plan achieves this objective.

Finally, the used oil plan is fair to all competitors selling motor oil. Whether it's the do-it-yourself or the installed side of the business, all motor oil becomes the responsibility of the seller, thus creating an equal playing field for all participants. Within the do-it-yourself market, those retailers without used oil tanks are also treated

fairly as they need only to provide a system to which their customer can return their used oil for proper disposal, as opposed to having to install used oil tanks at each one of their locations. This method allows us to deal effectively with the used oil problem while still being fair to all participants involved.

I'd like to change gears a little now and talk about a program we have recently launched in British Columbia with Mohawk Oil. On August sixth, we held a press conference at our Richmond, British Columbia store to announce the launch for a used motor oil program through our thirty nine Canadian Tire stores in British Columbia. To participate, customers simply bring back their used motor oil to one of our auto centres, whether they bought that oil at Canadian Tire or at one of our competitors. They sign a log book verifying the substance being returned contains uncontaminated motor oil, transmission fluids, gear oil or hydraulic oil only. In return, Canadian Tire offers customers bringing back used oil, a coupon towards their next purchase of MotoMaster Oil. We also assure them that used oil being returned will be handled in an environmentally responsible manner. Mohawk then takes the used oil, removes any dirt and contaminants and blends it into quality rerefined products that will be used again, thus conserving a non renewable resource. We like to call this closing the loop.

Through our point of sale material, newspaper adds, and our weekly flyer program we are also actively involved in trying to educate customers on the importance of proper disposal of used motor oil. Ideally, we would like to use the B.C. program as a template from which we will develop a national program in our four hundred and twenty stores Canada wide. The challenge we face, and it's also a challenge that other retailers face, is the issue of liability. Unfortunately while trying to offer this important environmental service we must also consider the potential liabilities involved. The possibility of receiving contaminants other than used oil exists. Provincial environment regulations at present, place the burden and cost of disposal of contaminated used oil entirely upon the retailer offering the used oil service. When considering that under normal operating conditions, in any car engine, there is little if any opportunity for motor oil to become contaminated by toxic or hazardous waste such as PCB's. We can only assume that these contaminants could be introduced... would be introduced from external sources. The issue of whether the oil retailer should be held accountable for the actions of individuals outside of our industry must certainly be addressed. The risks and potential costs dealing with what we anticipate will be a few individuals who abuse the program far outweigh the potential benefits to all Canadians who support the easy disposal system.

Government regulations, as they currently exist, act as a deterrent to anyone wishing to take a pro-active stance in addressing the used oil problem. Some key regulatory changes should be considered to help make this program work. In British Columbia, through our relationship with Mohawk Oil, we are better able to manage the risks involved. We do however have an additional three hundred and eighty stores in nine provinces across Canada where we don't have that same luxury. As a result, we're encountering difficulties in expanding our used oil program further across the country.

That's where Canadian Tire and all other motor oil retailers need the help of the various provincial environment ministries. I'd like to present to you our wish list. And I call it wish list because we're asking for your participation. It's a wish list of things retailers believe would help make this important environmental program work. First we ask that you help retailers deal with contaminated or toxic product by writing an approved method of disposal, and also by providing assistance to cover additional costs resulting from the disposal of these hazardous wastes in the unlikely event that contamination does occur. This is not meant however, to be a substitute for sloppy management practices on the part of the retailer. Retailers would still be expected to use all reasonable efforts to prevent the receipt of contaminated product, including the use of proper signing, testing procedures and of course staff training. Two, we ask that you support the CPPI plan so that all retailers operate under the same rules and that the competitive environment we presently all operate in is not altered. Those retailers who take an active role in the program should not be put under a competitive cost disadvantage by others who do not. We also ask that you do not classify used motor oil as a hazardous waste. Not only would this burden the retailers with additional record keeping and reporting requirements, but the increased cost of handling waste in the hazardous category would likely cause most retailers to shy away from a program such as the CPPI Used Oil Plan, and possibly encourage further indiscriminant dumping of oil by end users.

Along with the oil industry, we ask that you participate in a public education program that informs customers of the effects of improper oil disposal and to the more environmentally friendly options available to them. And finally, as the provincial environment ministries consider the direction they wish to pursue, we ask that you try to work collectively to develop a consistent, unified position on used oil for all provinces across the country. As a retailer, as a national retailer, it makes life much simpler to run a national used oil program that operates under only one set of rules. As we look at the demand side of the equation, we recognize that there is still a commitment required by the consumer to support the recycling effort by buying oil that uses rerefined based stocks. Government and industry alike can show leadership in this area by specifying it for use in their fleets where appropriate.

In closing, let me reiterate how much thought and effort has gone into the development of the national used oil plan. We believe it will be appreciated by our customers. It is an administratively simple and an environmentally effective program that allows us to pro-actively deal with a very serious problem. With the provincial environment ministry's help, the industry is poised to address this critical environmental issue. Let's get everybody's support to make this program a reality! Thank You!

YVON CHARBONNEAU
Vice-President / Vice-Président
SNC Lavalin

Merci René. Mesdames, messieurs, j'aimerais tout d'abord remercier l'Institut canadien des produits pétroliers de m'avoir invité à ce colloque à titre de représentant d'une firme de récupérateur d'huile usagée, ce que la division SNC Lavalin Environnement deviendra sans doute tout prochainement. Notre division s'intéresse aussi à la décontamination des sols et au reraffinage des huiles usagées, deux questions qui préoccupent aussi l'industrie pétrolière.

Étant donné que l'on m'a présenté comme ayant présidé la Commission d'enquête sur les déchets dangereux au Québec, laquelle incidemment a remis son rapport au ministre de l'Environnement il y a tout près d'un an, je me permettrai en premier lieu de reprendre quelques éléments d'analyse et quelques recommandations de notre commission.

Mesdames, messieurs, face au problème des déchets dangereux en général, et face au défi de gestion que posent plusieurs déchets particuliers (solvants, huile, pneus, boues, scories) la première question qui se pose, et qui nous a été posée par nos intervenants en audience publique et privée, c'est celle de la réduction à la source de la production de tels déchets ou résidus. Y a-t-il moyen dans le domaine de l'industrie automobile, dans l'activité industrielle en général de reconcevoir certains procédés de fabrication, certaines pièces d'équipement, certaines pratiques courantes de façon à réduire la quantité et la toxicité des huiles et des lubrifiants consommés et usagés?

Il ne revient pas au non-ingénieur et au non-technicien que je suis, d'apporter une réponse à une telle question sans doute plus facile à formuler qu'à résoudre. Mais, c'est en tentant de répondre à cette question première, et je me doute pas que des travaux soient en cours ici et là sur cette question. C'est en tentant de répondre à cette question de la réduction à la source que l'on s'intéressera à l'ensemble du cycle de vie d'un produit, au "design" même de ces produits, au choix des technologies et procédés les plus efficaces, et au schéma ou à certaines pratiques de consommation. Même si à première vue ces considérations sur la réduction à la source peuvent sembler loin du quotidien des millions de litres d'huiles usagées qui se perdent dans l'environnement, je crois important de suggérer que tout plan d'action en ce domaine, comme dans les autres domaines voisins, doivent incorporer cette dimension de la réduction à la source du problème posé.

Le deuxième point de repère utilisé par notre commission a été celui de favoriser la récupération, le réemploi et le recyclage des déchets de façon non seulement à éviter la pollution, mais à réduire de nouveaux prélèvements sur nos ressources naturelles de base et tout ce que ces prélèvements comportent à leur tour en terme d'énergie, de production de déchets, d'effluents et d'émissions atmosphériques. C'est dans cette optique que notre commission a nettement privilégié l'option du recyclage

des huiles usagées en recommandant que le gouvernement du Québec favorise, par tous les moyens techniques, réglementaires et fiscaux à sa disposition, l'implantation d'une usine de reraffinage des huiles usagées. Et dans le but d'appuyer concrètement ce virage à prendre, notre commission a vivement souhaité que la Société québécoise de récupération et de recyclage, la société RECYC, devienne un intervenant majeur dans l'organisation des divers éléments du circuit de prise en charge des huiles usagées au Québec. Par la tenue de campagnes de sensibilisation et de promotion, par des formules d'appui à la mise en place d'un réseau provincial de collecte et de récupération, par des mesures de soutien de la mise en marché des huiles reraffinées, par exemple.

En troisième lieu, puisque certaines huiles ne sont pas recyclables, il faut prendre tous les moyens environnementalement acceptables d'en récupérer la valeur énergétique et calorifique. Étant donné les inquiétudes de la population à cet égard, il importe de faire la preuve publique que ce recours complémentaire au recyclage est sans dommage pour l'environnement comme le propose notre recommandation en ce qui a trait à la combustion en cimenteries des huiles contaminées au-delà de cinquante (50) parties par million. Il s'agit d'ailleurs d'une recommandation à laquelle le ministère de l'Environnement du Québec a entrepris de donner suite. Nous sommes bien conscients que sorties de leur contexte, certaines recommandations risqueraient de perdre de leur sens. Mais c'est à partir d'axes décisionnels bien définis et bien priorisés, bien hiérarchisés que nous avons formulé nos recommandations. Et ces axes, je les résume : réduction à la source, récupération, réemploi, recyclage, valorisation énergétique et thermique. C'est à partir de ces principes de base que nous avons formulé notre plan d'action et nos recommandations.

Les données et recommandations que je viens de vous résumer, reflètent une très large consultation menée pendant plus d'un an dans toutes les régions et auprès de tous les milieux du Québec. Je voudrais certes profiter de l'occasion pour souligner la qualité de la coopération que nous avons reçue de plusieurs associations industrielles et tout particulièrement de cet organisme qui s'appellait alors l'Association pétrolière du Québec, ainsi que de l'Institut canadien des produits pétroliers. Notre commission a pris note avec grande satisfaction du plan d'action préparé, mis de l'avant par l'Institut et s'en est inspiré largement. Votre secteur a pris les moyens de connaître et de faire connaître la situation. Il a voulu se concerter avec d'autres intervenants essentiels, il a élaboré un plan d'action et fait appel à la collaboration des gouvernements, des utilisateurs et du grand public. Votre secteur a fait ce qu'il fallait faire pour vulgariser ce problème dont l'ampleur et la diffusion ne sont plus à décrire. Il est heureux de voir que cette concertation de tous les secteurs intéressés est sur le point de produire des résultats.

Mesdames, messieurs, si on aspire à dépasser ces états de situation, ces recommandations, ces plans d'action, je crois qu'il faut réunir trois éléments essentiels. Premièrement, les ministères d'Environnement, et je parlerai en tant que Québécois du ministère de l'Environnement du Québec, doivent indiquer la direction à suivre. Il faut que le ministère de l'Environnement indique l'approche à privilégier, qu'il statue sur les mesures à prendre pour favoriser la collecte de ces huiles contaminées et pour développer les marchés ou les débouchés des huiles régénérées. Il faut que le ministère stimule aussi la mise en place des partenariats les plus souhaitables.

Loin de moi l'idée de dire ou de suggérer que tout dépend du gouvernement. Toutefois, les règles du jeu relèvent largement de son intervention et des consensus à bâtir. Ils se bâtissent mieux lorsqu'il y a des propositions sur la table que lorsque tout baigne dans l'indécision. Mais soyons optimiste, il paraît que quelque chose se prépare en ce sens.

Deuxième ingrédient, il faut que des entreprises en environnement conçoivent des projets de récupération et de recyclage fournissant les instruments concrets de cette gestion intégrée dont tous parlent. Et la tâche n'est pas simple. L'entreprise qui vise le marché de la récupération et du recyclage des huiles usagées au Québec, doit d'abord concevoir un projet, en monter le financement, se trouver un emplacement, déterminer sa technologie, obtenir les autorisations municipales et ministérielles nécessaires et gagner l'acceptation du public. C'est beaucoup, et peu à la fois, car compte tenu des circuits officiels formels de récupération en place qui mènent les huiles usagées vers l'élimination et l'incinération au Québec mais surtout à l'extérieur du Québec, où le recyclage est possible, et aussi compte tenu des circuits informels qui permettent ce qu'on appelle la disparition d'importantes quantités, compte tenu aussi de la nécessité de restructurer, de stimuler, le marché des huiles recyclées, et compte tenu aussi enfin de l'instabilité du coût international du pétrole brut, l'entreprise qui se lance dans cette aventure doit mesurer ses coûts avec prudence.

Troisième ingrédient, il faut en arriver à l'établissement d'une chaîne d'entreprises. Une sorte de réseau qui agirait en "joint venture" informel. Un réseau qui lierait les fabricants et les grossistes et les détaillants d'huiles vierges, les utilisateurs industriels et individuels, éventuels producteurs d'huiles usagées, les récupérateurs, transporteurs et exploitants de centres de transfert, les fabricants d'huiles régénérées et enfin les grossistes, les détaillants et les consommateurs de tels produits. Eh bien cette chaîne n'existe pas partout. Elle est difficile à établir. Et ce n'est que par l'action combinée des pouvoirs publics, des entreprises industrielles et commerciales et des associations de consommateurs que cet ensemble prendra forme. Pour que le redressement et cette architecture souhaitée prenne forme, il faut donc un encadrement réglementaire approprié. Il faut des incitatifs économiques qui peuvent prendre des formes diverses. Nous allons en discuter aujourd'hui, qui devront tenir compte aussi du besoin de desservir des régions périphériques à population dispersée. Il nous faut aussi des campagnes de sensibilisation et d'éducation du public, des outils nouveaux et

permanents, des concertations entre les intéressés et diverses mesures d'organisations pratiques.

En terminant, je voudrais souligner qu'un choix de gestion des huiles usagées privilégiant leur recyclage favoriserait à la fois la protection de l'environnement et le développement économique du Québec. On peut en effet soutenir que le reraffinage de 25 000 000 de litres d'huile usagée pourrait entraîner une augmentation du produit intérieur brut québécois d'environ 125 000 000 \$ par année sans compter les retombées indirectes reliées aux emplois et commerces connexes, et sans tenir compte du gain d'autonomie énergétique qui en découlerait. Cette augmentation de l'activité économique est probablement de l'ordre de vingt fois supérieure à celle qui résulterait, par exemple, du recours généralisé à la seule valorisation énergétique et infiniment supérieure à la destruction par incinération.

Le problème de la gestion inadéquate des huiles usagées au Québec peut donc être résolu à la fois à l'avantage de l'environnement et de l'économie à condition de bien vouloir prendre les mesures appropriées. Je crois que cet atelier est l'expression de cette recherche et de cette volonté. Je vous remercie.

ARTHUR MEYER

Executive Vice-President / Vice-président directeur

Mohawk Oil Canada Limited

President / Président

Mohawk Lubricants Limited

Thank you Mr. Chairman, Ladies and Gentlemen. It is the intention of this presentation to present the case for rerefining as the preferred method for disposal of used oil. We believe it's a very sensible option and many technical groups and government committees have already reached that same conclusion. Modern rerefining is recycling in its truest form. It takes a product manufactured from a non-renewable resource, brings it back to its original quality level without creating another environmental problem in the process, and can be repeated over and over again. The phrase that we use frequently is; "Oil doesn't wear out, it just gets dirty".

The most modern process today is the one that is working at all of the major new rerefinerries in the world. In the Mohawk process, a continuous feed of used oil is heated in a fairly conventional refinery type heater and in stages it is de-watered, de-fuelled and vacuumed distilled into separate grades of distilled oil. And those oils are then hydro-treated to produce a fine clear product. Mohawk has developed a proprietary technology which extends the on-stream operating periods, reduces maintenance expense, and extends catalyst life. A 1990's rerefinery is an environmentally acceptable continuous flow refinery, that is a credit to the oil refining industry.

In March of 1990, CPPI announced to the world at Globe '90 that it was embarking on a program to collect all the recoverable used oil in Canada and to dispose of it by acceptable methods. Everybody involved in the manufacture, importation, blending and marketing of lubricants must undertake a fair share of responsibility to provide the facilities or to bear the cost for its collection and disposal. The annual sales of lubricating oil at a billion litres generates about 40 percent (40%) in terms of used oil or around four hundred million litres. So its disposal is a major environmental problem. If all the collectable amount was rerefined, it would produce about two hundred and fifty million (250,000,000) litres a year of base oil, about seventy two million (72,000,000) litres a year of distillate fuel, and about forty eight million (48,000,000) litres of residue for asphalt extension.

The problem is the present lack of rerefining capacity in Canada. This, all of us can help by being prepared to purchase rerefined oils and encouraging governments to control the burning of used oils and its use for road oiling. The rerefining method of disposal makes sense from the overall environmental point of view and I hope to prove to you that it also makes sense to the blender and compounders of lubricating oil even if they are themselves producers of base oils.

So what was, and to some extent still is, the problem ? Firstly, it is the stigma of the old style refiner. We all know what he looked like and many of his practices were less than acceptable. The stigma was so strong that even ten years ago when we built our plant our Board of Directors were trying to avoid the use of the word rerefining. We actually owned a base oil extraction plant. But in 1991, we are now selling our base oils to most of the oil companies in Canada and to a number of blenders and packagers. The stigma is nearly gone. All our gasoline and diesel engine oils are registered with the American Petroleum Institute and we are licensed by them to display their donut symbol. Various formulations containing our base oils have been fully engine tested to SG and CE performance levels and we understand that the products of the other two North American rerefiners using similar technology have also been engine tested. Our hydraulic oils fully meet all major pump manufacturers' specification such as Denison HFO, Vickers 35 VQ 25, Cincinnati Milicron and Caterpillar HYDO. Mohawk 150 base oil has been approved by the Canadian government for use in formulating a dormant spray oil for spraying fruit trees and we have enjoyed the major share of this business in western Canada for the past five years.

Both the Mohawk base oils have passed the modified AMES mutagenicity test. We believe that modern rerefining is a superior disposal method to using used oil as a fuel. On the other hand, burning with proper emission controls such as special scrubbers and filters to prevent lead, zinc, and halogen compounds entering the atmosphere is another method of disposal. It produces BTU's, but it can only be burned once. There are large volumes of waste hydrocarbons other than used oil that can be collected for burning purposes.

A rerefinery today has to be a fairly large complex. Sophisticated laboratory facilities are an absolute necessity, as is correct and safe storage and handling facilities. In the burning business, with so many small collectors who cannot justify their own laboratories, or afford outside lab analysis, there are many who don't even know what they are collecting. So they don't know the correct, environmentally safe disposal route. The larger collectors do of course, and have an analytical capability. I mentioned that the stigma of the old style rerefinery was a problem, and this has helped to create in part the second problem, which is the lack of rerefining capacity. This can be changed, but it requires the cooperation of governments at all the various levels, the oil companies, the majors and the independents, and the rerefiners. The governments' part is to prevent, through regulation, environmentally dangerous methods of used oil disposal such as dumping into landfills and the sewer system, road oiling and uncontrolled burning. The oil companies' part is to incorporate rerefined based oil into their supply source for the manufacturer of lubricants. This is reasonable because; one, the demand for lubricants is increasing year by year and a number of existing virgin oil plants are becoming obsolete; two, more and more governments are requiring rerefined oil for government owned equipment; three, the development of additional rerefining plants will take time. Supply shocks can be avoided. Four, oil companies will gain recognition from governments and the public that they are solving the industry problem and being good corporate citizens and conserving and reducing foreign imports.

The rerefiner will invest his money in building the refinery, plus a collection service that will control the collection of used oil by trained personnel in approved vehicles into secure storage before it is fed into the process. This will relieve the oil supplier and his customer of their disposal liability problems. If the rerefiner collection costs can be controlled through governments' prevention of environmentally unacceptable disposal routes, and the oil companies encourage their customers to direct the used products to the rerefiners collection service, and are prepared to purchase some of the finished product, then the finished base oil at the rerefinery gate should be competitive. The scenario described is not just a dream, it has been operating successfully in Canada for the past couple of years. And to me, this is a win, win, win, situation for everybody.

Mohawk hopes to encourage the cooperative development of rerefining capacity to serve the whole of western Canada at a pace that is compatible with the plans by industry members. In collecting oil from the Canadian prairies, it maybe economically prudent to include the Northern Tier States. In order to launch collection systems, it will be necessary to establish at least one properly designed burning location in each region as an alternate to rerefining. It would be ideal if the burning site was at the same location as the future site of the rerefinery. It would also be ideal if the burner could be price indifferent as to choosing used oil as fuel versus another low cost fuel source and therefore could be a long term interruptible disposal outlet to help maintain a collection versus disposal balance. It would be ideal if the regulations established in each province governing the storage, handling and disposal of used oil would be similar so that no artificial barriers would block the system.

As the markets shift gradually away from do-it-yourself oil changes towards quick lubes and automotive garages because of the complexity of modern automobiles and machinery, the job of collecting used oil will become more efficient. Similarly, as farms grow larger and operate bigger, more sophisticated equipment that is serviced in a proper on-farm service building, collection will become more efficient. With proper planning and large enough plants servicing large areas of geography, the cost of rerefining can be managed to very competitive levels and every producer or blender/packager will want to participate at least to his share of the used oil stream.

We believe that the CPPI objectives of collecting all the available used oil by 1995 can be achieved and we congratulate the used oil task force for the excellent work they have done in stimulating the thought and action in so many quarters to make this happen. Let's keep it rolling!

ERIC FINES

President, Canadian Portland Cement Association

Président, Association canadienne du ciment Portland

Thank you very much Mr. Chairman. Over the last few years, the Canadian cement industry has become involved in examining the role which the industry plays, or can play, in protecting the environment. One of the conclusions is that our industry has a huge potential to provide environmentally friendly solutions to the management of some of society's waste. An answer that we believe is safe, an answer that conserves scarce energy resources, an answer that reduces the cost of manufacturing cement, and an answer that does not add, and in some cases could reduce CO₂ emissions, a contributor to the global warming problem.

The proposal is the recovery of resources from waste in cement kilns. Resource recovery may be in the form of partial replacement of kiln fuel using organic waste or in the form of partial replacement of material for raw feed using inorganic wastes from other industrial processes such as dust from steel mills, fly ash or by products from foundries. The specific treatment of interest to this group today is the partial replacement of fuel with waste oil. The same technology applies to other organic waste fuels such as scrap tires, refuse derived fuel from municipal garbage, solvents, wood wastes, some industrial sludge, and shreadings from automobile recycling.

One of the largest road blocks to acceptance of these proposals results from a lack of understanding of the cement manufacturing process. We need to educate, and in that theme today I would like to explain to you the cement manufacturing process, the unique characteristics of a cement kiln environment, the qualitative potential of the industry to burn waste oil, and the benefit to Canadian society at large.

Just to define some terms: concrete is the material most of us see in everyday use. It's that material that's made from sand, stone, cement and water. We'll only be talking about the cement manufacturing process today, that grey dry powder, not concrete. To make cement, a source of lime, iron, silica, alumina, and gypsum are required. Lime stone, steel manufacturing waste, clay, sand and gypsum are some sources for the materials used in cement manufactures in Canada.

Twenty plants are located in eight provinces across Canada with the capacity of fourteen and a half million (14,500,000) tonnes. The plants are usually located near the major raw material source, the limestone quarry, and as close to major markets as possible. In the process, raw materials are quarried, crushed and blended for uniformity. The raw materials are then proportioned depending on the type of cement that's made, mixed, ground and blended again, and then finally, to the burning process itself. Now, in an energy efficient plant, the raw materials, are fed through a pre-heated tower where the heat from the exhaust gasses from the kiln is transferred to the raw materials to conserve kiln fuel. The raw feed passes through the kiln at a rate controlled by the slope and rotational speed of the kiln. Fuels are forced into the lower end of the kiln. The raw materials are partially fused as they pass through

the kiln at temperatures up to fifteen hundred (1500°) degrees celcius to produce a product coming out of the kiln known as "clinker". After cooling, the clinker is blended with a small amount of gypsum and then ground again to a very fine powder and that final product is called Portland Cement.

A major cost of cement manufacturing is energy. In 1990, the industry used fifty two million gigajoules (GJ) of energy which is the equivalent of about one point three (1.3) billion litres of oil. Since the dramatic increase in energy costs in the early 70's, process changes have been made resulting in a twenty five percent (25%) reduction in the energy per tonne of production. During that same period, a switch to cheaper, more available fuels occurred. Bunker oil use dropped from about thirty nine percent (39%) back in the early 70's to about two percent (2%) today. Natural gas usage dropped from forty nine percent (49%) to twenty four percent (24%), while coal and other fuel usage increased from twelve percent (12%) to seventy four percent (74%). Today the predominant fuel used in western Canada is gas, the predominant fuel in eastern Canada is coal. Further energy conservation is techically possible although the most economically attractive opportunities have been exhausted. The next major potential opportunity is resource recovery from waste.

I'll first explain some of the features of the cement kiln. The cement kiln is a rotary furnace about four to six metres in diameter, fifty to two hundred metres long. In order to make cement clinker, the cement kiln by necessity possesses several unique characteristics which also happen to ensure the safe combustion of organic waste. The gas and the burning zone of the kiln reaches about two thousand degrees celsius (2000°) for a period of three seconds. A commercial incinerator by comparison often burns below a thousand degrees celsius (1000°C) for about one and a half seconds or less. These high temperatures make these cement kilns one of the most efficient devices available for combustion of organic wastes. Disposal of ash generated as any incombustible becomes incorporated in the cement clinker or in the cement kiln dust, a by-product. Any changes in stack emissions between making cement with fossil fuel versus waste fuels are minimal and may actually decrease. Consequently, no significant additional emissions are added to the atmosphere. Tests may be required depending on the waste burned for confirmation if any doubts exist. Unlike many industrial furnaces, the kilns' raw materials are alkaline and the products of hydrogen chloride and sulphur-oxide formed are stable compounds of cement clinker instead of contributing to acid rain. These are the characteristics which make a cement kiln suitable for burning organic wastes.

To give some scale to the potential for contributing to the waste management solution, I'll give you some examples. If every plant in Canada replaced twenty percent (20%) of its kiln fuel with used tires, we could consume all of the twenty six million (26,000,000) tires wasted each year in Canada. If the industry replaced fifteen percent (15%) of its kiln fuel with refuse derived fuel or RDF, assuming that sixty percent of garbage is recyclable or non-combustible and the remaining forty percent (40%) is suitable for making RDF, the industry could use the RDF portion from about ten percent (10%) of Canada's sixteen million (16,000,000) tonnes of municipal garbage. If every plant in Canada replaced forty seven percent (47%) of

its kiln fuel with hazardous industrial waste, we could use one hundred percent (100%) of the million tonnes available of organic hazardous industrial wastes which are currently being treated off site from the manufacturing facility. Of specific interest to this group, if fifty percent of the one hundred billion litres of lube oils sold are collected, our industry, by replacing thirty eight percent (38%) of its kiln fuel has the capacity to use all the collected waste oil. As I was listening to the comments this morning, filters are another consideration and if filters are designed so that the container could be used to recycle the filter, the contained oil could also be used as kiln fuel.

Please understand that these potentials were not additives, and it's improbable that all plants would opt for a single waste fuel. The numbers only indicate the potential to make a large contribution to waste management. To use Art's terms, we also believe this proposal is a win, win, proposition. Energy is conserved. Non-renewable fuels such as coal and natural gas are replaced by waste. The environment is improved. Materials that pose a threat to the environment are safely destroyed without increasing emissions. The Canadian cement industry remains globally competitive by reducing fuels costs in step with its global competitors who are currently introducing these practices as well. Our balance of trade, Canada's balance of trade is improved, reducing imports of coal and providing conditions to allow increased cement exports.

I would like to comment on energy recovery versus the other R's, reduce, reuse and recycle. Our industry is fully supportive of society's efforts to reduce the volume of materials ending up in the waste stream. The first three R's are accepted as generally preferable to the forth "R", resource recovery. There are however limits to the percentages of waste that can be relegated to the first three R's - limits imposed by economics, and limits imposed by the market demand for recycled products. We believe that energy recovery is completely compatible with the first three R's and is clearly preferable to land filling where all resources are lost, and preferable to incineration which adds combustion gasses to the atmosphere and requires disposal of ash.

Specifically with respect to used oils, we applaud the CPPI proposals to develop collection systems for used oils. We agree that rerefining is the preferred option. However, limits imposed by inadequate or absent rerefining capacity, unsuitable oils for rerefining, imbalance between market demand and supply for rerefined oil, the desirability of having at least two disposal options in each regions, are factors which favour the consideration of energy recovery from waste oils in cement kilns as a back up alternative treatment. If used oils are used for kiln fuels they will be analyzed and must meet specifications to satisfy environmental regulations, cement operation requirements and cement product requirements. Effectively this puts limits on water content, PCB levels, lead levels and levels of other metals and/or inorganics.

The large environmental step forward in the integrated plan proposed by CPPI will be the provision of available alternatives to reduce, or eliminate the dumping of oil into the soil and water. The environmental differences between rerefining and energy recovery by comparison are minor. We realize that waste management in our society is a politically difficult issue. One that challenges our old habits and our standard of living. There may be no perfect solutions, only solutions that make dramatic improvements to our environment and minimize risk to an acceptable level. We submit that energy recovery from waste oils in cement kilns is a proven low risk alternative which should be an important component of energy conservation, waste management, and recycling strategies. We appreciate the opportunity to explain the role that cement kilns can play in the used oil plan. Thank you!

TONY CLARKE

***Director General, Environmental Protection and Conservation
Environment Canada***

***Directeur général de la conservation et de la protection
Environnement Canada***

Bonjour mesdames et messieurs. I'm very pleased to be here. I'm with Environment Canada as you've heard. You heard a very clear statement this morning from Minister Charest. The Federal Government, not just Environment Canada, supports fully the national used oil initiative, the subject that is being discussed today.

This initiative is fully consistent with the Green Plan. I would be remiss as a federal bureaucrat if I didn't mention the Green Plan at least once in my speech this afternoon. But, I presume you all know what Green Plan is, and if you don't, talk to me afterwards. In any event, it is fully consistent with the Green Plan in that it reduces used oil disposal into the environment. If you noticed, I didn't use the word wastes. It's tremendously supportive of therefore the overall national goal of the fifty percent (50%) reduction of wastes by the year 2000. It promotes recycling, reuse and recovery. In Federal parlance, the word recovery is not a nasty word. Used oil is a valuable material. It should not be viewed as waste. It has energy potential, and with the technology that we've heard about this morning, it can be recovered. And it conserves or helps to conserve a non-renewable natural resource, the fact that it can serve as a alternative source of fuel.

The best part about all of this is that apparently it makes economic sense. So, we somehow managed to link the environment and the economy here again once more. You've also heard that the Environment Ministers across Canada (CCME), like this initiative and they are in favour of it. It's also clear by the full house that we have today, that a broad spectrum of interests, the producers, the retailers, the wholesalers, the rerefiners, consumers, NGO's, you name them and if I've missed a few I'm sorry, but there appears to be a very broad cross-section of interest here. I think it's fair to say that in my opening remarks here, I haven't found anyone yet, or any group, who is not intrigued or interested with this particular initiative. And wants it to work.

This initiative is a very interesting one for people like ourselves in the federal government. It spells out the way in which we believe we should be doing business more and more in the future. The plan recognizes the problem and a need, the need to address the tremendous pollution potential out there of two hundred and fifty million (250,000,000) plus or minus litres of used oil. There's a growing consensus by many if not all we must do the responsible thing for the environment and by the way, it will do something for the economy too. All sectors of industry are voluntarily taking the initiative. They're being pro-active, they're pressing ahead, they're not waiting to be pushed into the scheme. That's heartening for someone who works in an agency that is largely regulatory and therefore we have to do the pushing. It's manna from heaven when someone comes along and says: "I wanna do this thing

voluntarily", we like this approach. It's a good push in an approach to pollution prevention and even better still, in large measure it is being supported by market forces. I know you need some government help but in the main, market forces and green consumerism is going to help drive this thing. So, with all of this, I would say that there's hope for the environment. There's certainly hope for the concept of sustainable development because if sustainable development is going to happen, in fact the motivation must come from within, from with us. We must want to do it, not necessarily be pushed into doing it. The chances of success are so much better when we do things voluntarily and it's built into the ethic. So, this plan, this approach is truly unique, it's a tremendous opportunity in Canada to succeed, to make it happen because of all of the things that I've said and because of the partners that are involved. Many, many partners as I've mentioned before, we're all stakeholders in this process, we're sharing in the responsibility for responsible action and this has got to be the sure recipe for success. If it isn't, I'm not sure what is.

And so, with an activity that's national in nature, voluntary in it's origins, rests on partnerships, aimed at reducing valuable material loss into the environment, talks about the four R's, recycling, recovery, reduction and reuse, not necessarily in that order, but it reuses and recycles valuable resources, in this instance used oil, recovers energy, and makes money in the bank, well, it just seems to make good common sense. And I think therefore, we must find a way today to make it happen, to make it work. Now, we in the federal government, and I'm not just speaking again for Environment Canada, friends from ISTC are here (Industry, Science and Technology Canada), EM&R (Energy, Mines and Resources), we want to make this thing happen, we want to be a positive partner, we want to contribute and as I say all of this I'm very conscious of the fact that I have a whole ring of provincial colleagues that are going to come up afterwards and say a few words, we'll do all of this, we'll respect jurisdictional lines of authority. I must make that crystal clear. Having said all of that, and it's true because most of the action is at the local, provincial and municipal levels, that's where the real action lies. But we would like to help if we can and we will. We think that we can help through CCME, that body that's trying to forge a national approach to environmental problems and solutions, we can continue to work with our provincial colleagues to encourage this national harmonized approach which you are looking for and seeking so desperately. We will undertake, we will commit to keep working in that forum to make sure this harmonized approach is achievable. We can help with public information, awareness and educational materials and I think every time you hear the words we can help, I know it sounds rather mercenary, but I suppose what you should read into that is that money is available to do these sorts of things. It's terribly unfortunate, as was mentioned this morning, that there is such a gap in knowledge out there, such mis-information or lack of information. It's really ignorance about what can happen. But certainly technologies that do exist, many of them do give us a solution to a problem and somehow the message isn't getting across.

I think we, in the Federal Government, with our partners can perhaps help to take that message across the nation. We could also help in technology development, research R&D and so on, but from a lot I've heard this morning it sound as if the technology is there. We really don't need to invent any more new processes. There doesn't appear to be much of an opportunity there, although through the CCME we did help to cast the Codes of Practice and do certain background studies. If further studies need to be done, if you need better information, stats., who knows, facts on the do-it-yourselfers and whoever, well we'll listen, we're open, talk to us, we'll try to help in which ever way we can.

So, that's the message I want to leave with you here, a sense that we're open for business in any way, shape, or form that we can possibly help, to support this particular initiative, respecting of course our jurisdictional authorities. As I said before, the power to regulate really lies in the hands of the provinces and I suspect it's a real challenge for them. Someone mentioned thirteen jurisdictions here today. It isn't easy to bring a national approach through thirteen jurisdictions and I'm sure they'll tell you some of the difficulties there. What we would undertake, again in which ever way we can, as a Federal Government, playing within the CCME arena, is to try to facilitate the level playing field.

I should add one last point before I close. Some of you know of course that used oil is one of the forty four substances on the priority substances list. I wouldn't want to keep that under the table. It is there. An assessment is currently being done as to whether it is toxic, at least as defined under the Canadian Environmental Protection Act. If it's found to be toxic on the CEPA, then I guess we're going to have to have a little closer look at the control options and strategies as to what needs to be done. God forbid that we find it toxic or hazardous. If it's found to be non-toxic, I guess CEPA will not apply. But, the point that I'm going to try to make in all of this is that all this could be academic, all this business about assessments and studies and whether it's toxic or non-toxic or hazardous or non-hazardous or waste or whatever. All of this could be academic if this workshop today builds a national will to take action to make this plan happen. And quite frankly, the bottom line, as far as the federal government is concerned, is that that's the way we would like to see it happen. So, good luck and we'll be participating and we'll be following this issue very, very closely. Bonne chance!

WAYNE GRADY

Deputy Minister, Nova Scotia Environment

Sous-ministre, ministère de l'environnement de la Nouvelle-écosse

Thank you very much Mr. Chairman for your very kind introduction and may I convey at the outset my appreciation to Claude Brouillard and to Les Stewart, the Atlantic Vice-President, for the opportunity to join with the Canadian Petroleum Products Institute this afternoon and all those interested in the issue of the national used oil plan. And again, congratulations for arranging this workshop. The attendance which you mentioned this morning, Mr. Chairman, the workshop was over subscribed and I think that speaks well of the importance and the resolve of all players, to come to some successful conclusion, and I share the desire which was expressed this morning, that hopefully this will be indeed the last such session.

Some of you may know Nova Scotia has a regulatory approach to the disposal of used oil. In November of 1989, the provincial government passed regulations under the Dangerous Goods and Hazardous Wastes Management Act regarding this material. Across the country, the method of dealing with this problem varies from province to province and there are provincial colleagues who will be addressing the matter in which they deal with this issues in their own specific jurisdictions.

In Nova Scotia, we have been operating under waste oil regulations for the past two years. The regulations cover the disposal and reuse of oil in all instances except individual homes and farms. The regulations state that waste oil must be tested for contamination before disposal. Untested oil can be transferred only to a licensed collector, then collectors must test all oil and any contaminated product must be reported. It is also note-worthy that the regulations banned the application of waste oil to road surfaces. In Nova Scotia a new industry has grown up in this area and I can point to one company, Inland Oil, and am pleased to see that the President of that company is with us here today, Mr. James Bagnell. Inland Oil exist only as a result of these regulations. Indeed one of the speakers this morning mentioned the economic spin-off to the development of dealing with the issue of used oil. And I do acknowledge the fact that it's not used oil, it's nearly another product waiting for another stage in its life cycle. The company also collects waste oil from New Brunswick, across the provincial border, and is now operating a rerefinery. As well, Inland Oil has been approached by individual service station owners who are now collecting some do-it-yourself product and returning it by way of this system. From our point of view, as the provincial Department of the Environment, we are satisfied that the bulk of waste oil from industry, commercial operations and other large generators is being disposed of properly. We're also satisfied that we are able to track instances of contaminated oil back to the generator who in turn must pay for any additional disposal difficulties caused by the contaminated product. Generally, we feel that we have a system in place which allows for the proper disposal of the greater portion of this material.

I think it would sum up the Nova Scotia experience by saying that we have set out the basic frame work of regulation which allows for solutions driven by the market place. We support transportation across provincial boundaries to facilitate collection. We support the use of waste oil as a fuel supplement and we also support rerefining. So, our basic approach or philosophy when dealing with this type of environmental issue is one of minimal regulation which allows for market driven solutions. And we wish to continue this approach as we examine the do-it-yourself sector.

In looking at the CPPI proposal for tackling the do-it-yourself sector, there's much I can agree with. I agree with the assessment that this is a sector that presently falls outside our regulaitons and I applaud the thinking that we're targeting it as a further area of environmental concern. It is surely in all our interest to encourage all users of petroleum lubricants to exercise good housekeeping and environmental responsibility for returning used product through proper disposal or reuse. However, where I believe this proposal runs into difficulty, is with the notion of greatly increased government regulation and with government's assumption of risk. Increased regulation poses a number of problems for environment departments which are already stretched to the limit when in comes to delivering programs. We, in the department of environment, are in a growth industry and unfortunately governments are not able to supply us with the necessary resources in order to deal with our mandates. All the more reason, in a time of limited funding, for us to choose those areas which we will target with some care. The result is that we have to work smarter, we have to work harder, and we have to work more efficiently. At the same time we have had to look increasingly at the private sector as a tool in environmental enforcement and protection. For example, in my department, we are starting a pilot project which will see licensed private operators take over inspection of petroleum storage tanks. My department will monitor the overall program. In other areas for example, such as in air quality, as the demand grows for more testing and monitoring, our approach will be the same. Industry will carry out the day to day monitoring and the Department of the Environment will carry out compliance checks or audits.

I hope I'm not giving you the mistaken impression that this is simply a matter of dollars and cents. That is, that we would, as an environment department, carry out large regulatory and monitoring regimes in many areas if we had the resources, because I don't believe that we would. And I say this because, like any corporation, we have had to examine where we are going and what our role and mandate is. We have had to come to a conclusion that we are the regulators not the operators, and that we are an enforcement agency and not a consulting firm. So, the message we are sending out to everyone who's business or operation impacts environmental concerns is the same. We expect them to run the operation in an environmentally responsible manner. We expect them to assume responsibility for products which they place into the market place, and for the waste stream, and we expect them to assume the cost of dealing with these products in an acceptable manner.

Does government have a role to play ? Obviously and certainly it does. And it's one of the reasons why I'm here today. We, in government, have a responsibility to assist industry in establishing a level playing field. And that's a topic that we certainly heard many times this morning and indeed this afternoon. It is our responsibility to ensure that conditions are the same from region to region, another topic that was mentioned repeatedly this morning. And also to encourage a market driven solution by allowing cross border transportation and by allowing further use for waste oil such as a fuel supplement. We, in the Department of the Environment, welcome this opportunity to discuss this issue further, including discussions on what the government can do to facilitate a solution. Let's look at a solution which is manageable. Let's also look at a solution which is manageable and fits easily into the regulatory regime which is already in place. I believe that there are businesses which are ready to propel solutions forward and indeed we heard one this morning. And I believe the Nova Scotia experience demonstrates that a market driven approach, when run by industry, with some government surveillance, is both sensible and workable.

Just before I close at this stage I'd like to depart a bit from my prepared text. This is a time when staff in the office of Ministers and Deputy Ministers start to get figity and nervous as we, as Deputy Ministers, and I'm sure the Honourable Mr. Clements will attest to this, as we tend to get ourselves into some trouble.

But this morning repeatedly, I heard consensus and agreement on this issue. There was a great deal of agreement on obviously the need to address the issue, if there wasn't, we wouldn't be here. There were suggestions on the need for uniform legislation and regulations across Canada, the need for governments to help establish the level playing field, and the need for consumer education. Again, speaker after speaker this morning mentioned those particular areas and I think they are very important. And I was particularly pleased because originally I had planned to fly in late this morning and make my presentation and then leave, but I'm very pleased that I changed my travel plans and had the opportunity to hear the speakers from the cross section of the industry this morning, and to hear the amount of consensus and the desire to come to some resolution of this problem.

Mr. Charbonneau, this morning, made a statement that it was easier to ask a question than to resolve an issue. I'd like to perhaps throw out, for discussion purposes, an alternate proposal in dealing with the do-it-yourself market. I'm relatively new to the environmental field, having spent most of my career in health. One of the things that I had occasion to read, only having been the Deputy Minister a few months, was the CPPI proposal. One of the things that struck me as I read it was the emphasis on government involvement, government regulation, government licensing and this all ranked completely counter to what was my perceived understanding of the desires of private enterprise. I think it's fair to state that private enterprise generally agrees the less government intervention the better. So I was some what surprised to see this approach.

This morning, Mr. Darbelnet cited a specific proposal in one jurisdiction where they put on a specific tax on tires which would eventually help to deal with the issue of disposal of tires, and expressed the concern and disappointment that a very small proportion of those funds are going to that specific issue. And perhaps I should bow to Mr. Clements, who is also the Minister of Finance in Prince Edward Island, to address this issue but I think it's fair to say that in general, governments and departments of finance, do not like dedicated specific taxes which are ear-marked for specific programs. And again, one of the speakers this morning mentioned the fact that often times those funds find their way into general revenue and even though they are raised for one particular purpose they are often not used for that purpose. That is reality. Governments don't like dedicated taxes and you always run the risk that the funds may not be used for their intended purpose.

I also liked one of the comments, and it's keeping with my personal feeling, that Bill Dempsey made this morning and that is, "let's move forward with approaches which would see as little legislation as possible, with minimal legislation and no new taxes", because I think at this stage, I know in our own jurisdiction, I think it would be unacceptable to our government to agree to a proposal which would lead to an increase in taxes.

The proposal, getting back to the specific, that I wish to throw out, is one that you haven't discussed with colleague Deputy Ministers but one which I think is in keeping with the general philosophy, which I think I explained today, is let's let the private sector deal with this issue with government being the facilitator, to a lesser degree that was proposed by CPPI, and that would be a system wherein the sellers of the product would be responsible for its control. By that, I mean that the wholesaler if you will, who sells the product to the retailer would request, demand that the final seller of the product to the consumer have a system in place that would see the disposal of the used oil, or at least to receive the used oil back from the consumer. I like that approach because again, as I say, it involves less government involvement but may require some assistance from government to put the onus back on the industry. I realize there could be many difficulties in that, that it may cause some upset in the market place, but this morning from the Canadian Tire Corporation, and it's certainly one that I will be exploring further, where they are taking the initiative in dealing with this issue with minimal government involvement. Again, during my short time as Deputy Minister, one of the concerns I hear from the private sector comes back again to that whole question of government regulation, and interference in the operation of a business, and I think that more businesses can accept that responsibility and certainly I'm very pleased to hear what I heard this morning and that's certainly that your industry is prepared to do that. I applaud it and encourage it, and I'm sure that by working together, we can resolve this issue.

Again, my appreciation for the opportunity to address your session and I wish you continued success in your deliberations and I know I speak for my Minister, the Honourable John Leefe, who is the current Chairman of CCME, that he would be absolutely delighted to have a proposal to put before his colleague Ministers at a November meeting in Halifax. Thank you very much!

ANDRÉ MARSAN

Assistant Deputy Minister, Industrial Sector

Environnement Québec

Sous-ministre adjoint, milieu industriel

Environnement Québec

Monsieur le ministre, monsieur le président, mes cher amis, je suis très heureux d'être parmi vous aujourd'hui, parmi la communauté de l'industrie, des services, et gouvernementaux, des communautés que j'ai appris à aimer et pour lesquelles j'ai le plus grand respect.

Je voudrais profiter de l'occasion qui m'est offerte pour vous présenter un portrait succinct de la situation actuelle concernant la gestion des huiles au Québec. Comme vous le savez, le Québec compte près de 6,5 millions d'habitants répartis sur l'ensemble des 1,6 millions de kilomètres carrés de territoire. Une part importante de cette population travaille dans les différents secteurs composant l'économie québécoise. Tous ces secteurs génèrent d'une façon directe ou indirecte des huiles usées qui doivent être gérées de façon à éviter tout tort à l'environnement et à la santé publique. L'automobile, le train, l'avion, le secteur industriel, sont les principaux consommateurs d'huiles et de graisses lubrifiantes avec une consommation moyenne au Québec de cent cinquante millions de litres par année. Ce volume de consommation n'est pas étonnant, compte tenu du nombre de véhicules, de parcs automobiles lesquels se chiffrent à environ 3,2 millions d'unités. L'utilisation des huiles conduit inexorablement à leur altération physique et chimique et le volume annuel d'huiles usées généré au Québec est estimé entre soixante et dix, et cent millions de litres. L'adoption du règlement sur les déchets dangereux en 1985 apportait un certain contrôle sur la gestion des huiles usées au Québec. Ainsi, il devenait explicitement interdit de prendre ses huiles comme abas-poussière. Par contre, l'utilisation de ce déchet ou de cette ressource dans les industries, dans les serres pour le brûlage à des fins énergétiques était permise à condition que ces huiles rencontrent les normes de qualité édictées par le ministère de l'Environnement dans son guide de gestion. Cette réglementation nous a également permis, grâce aux moyens de contrôle de la circulation, de constater qu'environ soixante pour cent des huiles usées n'étaient pas répertoriées. Ce qui représente un volume de quarante cinq millions de litres qui est disposé d'une façon inconnue au Québec. Si il y avait un seul secteur industriel qui était responsable d'une émission dans l'environnement, de quarante cinq millions de litres d'huiles usées, ce serait un outrage collectif et le gouvernement devrait fermer ces industries-là parce que ces huiles sont dispersées dans l'environnement. On a une grande difficulté à le faire mais il reste que le problème fondamental reste le même.

Quelle que soit la méthode de gestion utilisée pour les huiles usées, il est maintenant clair qu'il faut s'attarder rapidement à résoudre le problème de la collecte de ce fort volume d'huiles usées. Par conséquent, il faut tenir compte de tous les types de producteurs qui sont impliqués, de l'industrie... à l'artisan. Étant donné la dispersion de ces producteurs sur le territoire québécois et du grand nombre d'entre eux, il serait utopique de penser de régler le problème en effectuant des contrôles plus sévères. La solution réside, à notre avis, dans la possibilité de redonner une valeur aux huiles usées. Une telle approche permettrait d'arriver à une situation où, en bout de ligne, le producteur paye le moins possible pour la disposition de ses huiles et où les utilisateurs de ces déchets payent un prix correspondant à leur valeur intrinsèque comme pour le cas des combustibles ou des matières premières.

Le Québec tire 65 % de son énergie du pétrole. Un jour viendra, où cette ressource se tarira. Il faudra donc réorienter nos choix face à une utilisation rationnelle de l'énergie en général. Le gouvernement du Québec l'endossait en 1987, dans son énoncé de politique intitulé "Un nouveau cap environnemental". Il proposait d'adapter son action à une approche intégrée des questions environnementales. Le ministère de l'Environnement décidait donc de répondre au message lancé par la commission "Brundtland", qui préconisait une approche de développement durable, c'est-à-dire une approche qui sait harmoniser à la fois les concepts de l'environnement avec ceux d'économie. Une telle démarche implique la participation des tous les intervenants de la communauté, qu'il s'agisse des municipalités, des industriels, des syndicats, des travailleurs et des travailleuses et des groupes environnementaux. La problématique des huiles usées a donc été abordée en fonction de cette nouvelle approche. En effet, le ministère de l'Environnement, siège, comme vous le savez, à la Table québécoise de concertation des huiles usées, qui s'est fixé comme mandat de proposer au gouvernement des solutions et des orientations précises en matière de gestion intégrée des huiles usées en alliant ce principe du développement durable. Parallèlement à ça, le règlement actuel sur les déchets dangereux est en complète refonte et le nouveau règlement en préparation tiendra compte des principes du développement durable en favorisant la réutilisation et le recyclage.

Parallèlement à ce travail, le ministère de l'Environnement a amorcé un groupe de travail pluri-organisationnel, autant public que privé, afin d'étudier la possibilité de valoriser énergétiquement certains déchets dangereux dans des cimenteries et d'autres procédés industriels. Ce comité évaluera les critères techniques d'admissibilité des combustibles de substitution dans les cimenteries d'abord, et d'autres procédés par la suite. Le comité évaluera les impacts environnementaux et étudiera les implications sociales de tels projets. Il va de soi que le comité regardera en autres la problématique de la valorisation des huiles usées.

Parmi les autres solutions, il y a évidemment le reraffinage des huiles usées. Le ministère de l'Environnement, bien évidemment, est tout à fait d'accord avec cette option. Cette solution s'avère celle que le ministère d'ailleurs a privilégiée. Toutefois, plusieurs aspects demeurent encore sans réponse. Dont notamment, le véritable marché des huiles reraffinées et leur acceptation sociale. Il s'agit de problèmes complexes qui concernent également d'autres ministères ou entreprises privées et

même de consommateurs. L'absence au Québec, d'une usine de reraffinage fait en sorte que cette solution n'est pas disponible pour demain. Dans un premier temps, et comme je le mentionnais auparavant, parce qu'il est primordial de recueillir les huiles usées au lieu de les laisser se perdre dans l'environnement, il y a lieu de promouvoir leur utilisation à une fin énergétique. L'avantage à cette solution vient du fait qu'elle est disponible immédiatement, dans des équipements déjà en place, dont la performance a été prouvée au point de vue de la sécurité de l'environnement et de la santé publique.

D'autre part, nous savons que la qualité des huiles usées, en ce qui a trait à leur contamination au plomb par exemple, est supérieure actuellement à celle qu'il y avait il y a quelques années et elle s'améliore constamment. En effet, l'adoption de la législation fédérale en matière d'additifs au plomb dans les huiles usées, dans l'essence a eu pour effet d'abaisser la concentration de plomb dans les huiles usées. Une étude de l'essence de notre ministère confirme cet état de choses puisqu'en moyenne les huiles usées actuelles sont contaminées à environ cinquante milligrammes par litre (50mg/l) de plomb, alors qu'auparavant il y a quelque six mois, cette contamination s'élevait jusqu'à deux cent milligrammes par litre (200mg/l) en moyenne.

L'orientation de la valorisation énergétique cadre bien dans le principe de développement durable dont je vous parlais auparavant puisqu'elle répond à ces critères fondamentaux qui sont le réemploi, le recyclage, la récupération et la valorisation, substituant ainsi l'énergie nécessaire provenant d'une ressource qui est non renouvelable. De plus, elle permettrait de corriger plus rapidement une situation qui est vraiment, au Québec, intolérable.

La société a amorcé un virage important à l'égard de ces exigences environnementales. Un nouveau contrat social doit être établi entre un développement économique fiable et un environnement sain. Il appartient à l'État, aux entreprises, ainsi qu'à l'ensemble de la société de faire en sorte que ce contrat puisse être élaboré et mis de l'avant dans l'objectivité des connaissances scientifiques, le respect des individus et des groupes, et la détermination collective de régler nos problèmes. Je vous remercie.

DAVID THOMPSON

Director, WRAP Branch

Manitoba Environment

Directeur de la prévention de de la réduction des déchets

Ministère de l'environnement du Manitoba

Thank you very much Mr. Chairman and good afternoon ladies and gentlemen. It's a pleasure to be here to speak very briefly on the programs under way in Manitoba. Waste management is one of the top priorities with the Manitoba Environment. The waste management goals which we have defined are intended to ensure the effective management of waste materials by minimizing environmental effects to the environment and to the public health.

To meet our waste management objectives, we will have to deal not only with the safe disposal and handling of waste, but also the reduction and prevention of waste. The Government of Manitoba, like the Federal Government and all the other provinces has committed itself to cutting solid waste generated in the province by fifty percent (50%) by the year 2000. Under the Waste Reduction and Prevention Act, an Act that on August 30, 1990, became law, we have laid out strategies which we are confident will enable us to meet this goal. Although the provincial government has assumed the lead role in finding solutions to the waste problem, we are fully aware it is not principally our responsibility. Collaborative efforts by all levels of government, consumers, environmental groups and business are necessary to ensure we all share in our responsibility to reduce waste.

To initiate this process in Manitoba, the Minister of Environment in 1989 appointed a Multi-Stakeholder Recycling Action Committee to develop recommendations on a strategy on accomplishing this fifty percent (50%) waste reduction objective. In June 1990, the Committees' action plan, which included 56 recommendations, was publicly released. A particular emphasis in the report stressed strengthening the responsibility within the distribution chain for the reduction of waste from designated products and materials. The Committee's basic strategy said that the most efficient way to implement the principle of polluter pays for waste reduction is to hold the distribution chain responsible for the waste generated by their materials.

The new legislation, the "WRAP Act", was introduced to provide an effective process and the power necessary to address waste reduction programs. The Act provides a wide range of powers to the government, as one speaker said this morning, to do it. It allows, in regard to consumers, for deposits and handling fees, in regard to producers, for pre-disposal levies and license fees, an even an outright prohibition of products or materials. It provides for requesting reports and records from producers, and places emphasis on the public consultation process. But the Act also commits government, as well as industry, to "clean-up their own act", as you would say. The government is committed in Manitoba, in regard to oil, to using recycled oil and also to direct collected oil from our government fleet of vehicles to proper disposal

or recycling facilities. In the WRAP Act process, there are a number of stages. First of all; identification of a priority material; secondly, the appointment of a WRAP Committee by the Minister; and thirdly, setting targets; recommending plans and programs to meet these targets, the acceptance of the WRAP plan by the Environment Minister, implementation of the plan and finally assessment, by the department, on the effectiveness of the plan.

In the action plan that was presented to the Minister, high priority was given to automotive wastes including used oil. Used oil was initially named as one of the four priority materials in Manitoba and this included; beverage containers, old newspapers and tires, for the first four items to look at. In January of this year, the Manitoba Environment Minister met with industry leaders in the four specific areas of concern. WRAP Committees were established and in April 1991, reports were submitted to the Minister which will assist Manitoba Environment in further consultations and the development of an action plan for each of these materials.

In their report, the oil industry laid out their intentions for the establishment of a collection and processing system to the department. The system will target rural and do-it-yourself generators and encourages the development of re-refining solutions. The department does not currently have regulations, as may have been indicated this morning, but we are in the process of drafting regulations specifying the standards that will have to be met for the collection and handling of used oil, and addressing the question of how this material will be designated. Some of the things that we are looking at in our regulatory approach is restricting the use of oil as a dust suppressant, a ban from landfill disposal, we just recently passed a new waste disposal law, which affectively does this already but may require some re-enforcement - and looking at the uses of fuel in applications such as space heaters or cement kilns. Our regulatory approach should ensure facilities are available for the acceptance of used oil within the province. It may include a prohibition of mixing used oil with other wastes such as solvents or PCB's. It will establish recovery targets and we're considering the licensing of the seller distribution chain for oil.

One of the actions that we currently have under way is to determine the appropriate designation of used oil, being hazardous or special, and thus the applicable siting storage collection and transferral regulatory regimes. At present in Manitoba, used oil is designated as a regulated hazardous waste. In the province, in the city of Winnipeg, we have established a household hazardous waste depot which operates year round and provides a free drop-off facility. At this depot, it has turned out that used oil is one of the high volumes of wastes that are brought in from the residents in the city of Winnipeg.

In closing, the Manitoba Government supports the four "R" philosophy of reduce, reuse, recycle and recovery, and its applicability to used oil to be collected in the province. However, this policy is not intended to be rigid to the point of restricting activity in this very important area. My last words would be to congratulate CPPI for having convened this meeting and for obtaining the participation that has been indicated here at this meeting. Thank you very much!

RONALD DRIEDGER

***Director, Munciple Solid and Bio-medical Waste Branch
British Columbia***

***Directeur des déchets minicpaux, solides et Biomédicaux
Ministère de l'environnement de la Colombie-Britannique***

Thank you Mr. Chairman. Ladies and gentlemen, it is indeed a pleasure to be with you here and participate in this national workshop. I'd like to also publicly express my appreciation to the B.C. Task Force on Waste Oil, who we feel have really worked hard with us to try to work out a solution in British Columbia, and I'd like to recognize that.

In my presentation, I'd like to focus in on, not just used oil, but on some of the strategies that B.C. Environment is undertaking, but with specific emphasis on issues that are relevant to this workshop and CPPI.

For the last several years, environmental issues have either been at the top of the public agenda or very close to the top. And even though we are in the midst of a recession, last December when a poll was taken, nine out of ten Canadians still counted environmental issues as being one of the most serious. And in these polls, of all the provinces in Canada, it appears that British Columbia is the most green. We've got people in our province who really want us to take action.

Two months ago, B.C. Environment launched "Environment 2001", an environmental strategy for the '90's and beyond. And what it is, is a blue print action for environmental issues and it's in the form of a discussion document from which we hope to solicit the views and opinions of not only British Columbians, but other Canadians and our neighbours as well. Environment 2001 sets out a bold long term commitment. And the two that I'd like to emphasize is; the first one is "Zero Pollution"; the second one is "Sustainable Water, Fish and Wildlife" and in addition to Environment 2001, the Ministry is in the process of releasing nine discussion documents. Four or five of which have already been released, and another four to come in the next couple of months.

The document that concerns this workshop the most is what we call "New Directions in Environmental Protection", and it will lay out our legislated renewal strategy for British Columbia. Some of the objectives in this legislation is to give us the kind of legislative mandate to in fact work on "Zero Pollution". In the past, what we've basically done is worked with the fifth "R". What comes out the end of a pipe, not with the four "R"'s. We also want to look at market based incentives, user paced strategies, public consultation, integrated pollution control and things like administrative enforcement. We want to continue with the release of what we call a non-compliance list which has, incidently, helped significantly to increase our compliance level.

Within this framework of Environment 2001, I'd like to now zero in on some specific areas relating to our target of a fifty percent (50%) reduction in the municipal solid waste stream, and the kind of partnerships that were pursuing, not only with industry, but a partnership with local government and it's a partnership with people as well. Because one of the areas where government, and industry as well, has fallen down, I think, is in our communication with the public. To some extent we've lost touch, and in some of these issues, the public seems to be ahead of us.

The whole basis of our program in British Columbia, for the fifty percent reduction, is based on regional solid waste management plans for twenty nine regional districts in the province. Each one of those regional districts, by legislation, has to have an approved municipal solid waste management plan signed by the Minister of the environment by the end of 1995. So more than just finding the nearest landfill, it's to map out the strategy as to how we are going to achieve the fifty percent reduction within that particular regional district. Now, the province agrees that we must be a facilitator and must assist. And one of the ways we are doing it, with some significant financial assistance programs to help phase out old landfills and put in transfer station, is to fund one third the capital costs for multi-material recycling and composting programs. We're providing financial assistance to pay up to fifty percent of the cost to ship the recyclables to market. We're also providing extensive public education and information initiatives.

Now, to some specific reduction, recycling and partnership initiatives that British Columbia has recently launched. There was reference earlier to a five dollars (\$5)/per tire levy in Ontario. Well, British Columbia put in a three dollar (\$3) / per tire levy just over a year ago, but that money goes into the Sustainable Environment Fund. We have a levy as well on vehicle batteries and disposable diapers and that generates about sixteen million dollars (\$16,000,000) a year revenue, which happens to equal my budget. So, that money is going for solid waste management initiatives. And more importantly, about six point five million dollars (\$6,500,000) of that this year is going into a collection and recycling program for tires which was launched in June of this year. And it's promoting two uses. It's promoting the third "R" which is recycling as well and the forth "R", recovery. And I heard an interesting comment just before the meeting, as to how it is very difficult to set up the infrastructure for the third "R" immediately. What we're relying very heavily on first with the tires, is the forth "R". We recognize that that's a very important component and without that we couldn't launch an effective tire recycling program. They could take all the tires. So, the key is to develop the infrastructure. The first part of the program is a transportation assistance program. Basically, we're paying the cost to get the tires to the nearest processor.

The second part of it, is what we call an "end-user credit". If it's for the third "R", we pay a dollar fifty per tire or around a hundred and eighty three dollars per tonne. If it's for the forth "R" we pay a dollar per tire. The third part of this initiative to spur more new 3 "R" uses, we put a million dollars into the Science Council toward market and research development grants to perspective companies who have 3 "R" proposals for using tires. As well, with vehicle batteries, car batteries as of June first,

we launched a province wide system as well. But because lead has a value of its own, albeit, a very fluctuating value, we have only got what we call a transportation credit, but it's tied to the London price of lead. So, if the price of lead is really good, then the credit we give is very low and it'll only pay for drawing the batteries out of the most remote areas of the province. But right now, where the lead prices are depressed, it's a real help to draw in the batteries from all of the province. The interesting thing that has been noted is that even though the price of lead has dropped, we're drawing record numbers of batteries out of the province, to our two battery processors.

The next area is waste oil. And I'm very pleased with Canadian Tire's initiative in British Columbia, and actually we're hoping to sign an agreement with CPPI before the end of the year. If we weren't in the midst of an election we would have hopefully had the announcement already with our Minister. At this time we're not sure who our Minister is, but as soon as we have one, (and actually our Minister was suppose to speak today, it wasn't suppose to be me) as soon as our Minister is appointed, we do hope to schedule a press conference with the President of CPPI and our new Minister just as soon as we can, to announce the formal launch in British Columbia. And actually, I have a copy of the second draft of our proposed waste oil or used oil regulation that I'd like to hand out at our regional workshop after this. We think it goes a long way to resolving the problem. As you notice it's only on one page. Now, we put a little on the other side but, we basically got our regulation on one page. So, we don't have a lot of extra bureaucracy created, but just enough to assist the industry to have a level playing field, and to ensure that not only the do-it-yourself oil gets back, but we have to think about places like the Queens Charlottes and other places that we want to make sure that that oil also gets back for rerefining.

We're also working with the oil industry and with others on the issue of oil filters. There's a significant amount of oil in each filter and it's quite promising to see some of the technology that's already available and being used to squash the filters, drain out most of the oil, to separate the non-steel from the steel and being able to recycle the filters. As well, we're looking at the anti-freeze and some of the other wastes from the automobiles that have something to do with your industry. We're also working on national packaging task force initiatives and a number of things with the plastic industry and other industries. The key thing here is to minimize the regulations and get companies to take ownership and stewardship for their products. The way we did it with Dow Chemical is we said to them: "look we have good news and we have bad news. The good news is, we'd like to work with you in a partnership. The bad news is that if we can't strike a partnership, we're going to look at regulations, like secondary content.

Dow Chemical did come back to us and proposed what we think is a very progressive kind of arrangement which we hope to see expanded elsewhere. They agreed to purchase up to two million pounds per year of secondary high density plastic resin at eighty five percent of the world market price for virgin resin, which is more than what the normal market price is. That guaranteed that there would be a market, a way of closing the loop for high density plastics. We think that's very

important, even in waste oil, because another area where government has to assist, to facilitate, is to ensure that we have progressive procurement policies, that we encourage the use of rerefined oil in any new oil that's sold. We think we can do it without secondary content legislation. We're very fortunate to have Mohawk Oil in British Columbia. There isn't a problem in selling the rerefined oil. In fact, I think the public wants to participate with us and I think Mohawk can confirm that there is a very good reception to this eco-oil. A lot of other oil companies it turns out are doing it but they're just not telling us about it. It's not marked on the label but it does in fact contain rerefined oil. So we would like to see the oil companies take the challenge that they use enough rerefined oil in any new oil sold and that there isn't going to be a problem in having a glut on the market. We in B.C. also realize that we should reconsider our special waste regulations to ensure that the part of the waste oil that can't be rerefined, and we recognize that it all can't be rerefined, has an acceptable end use. We're looking to amend our regulations to allow that this residual could be disposed of in facilities like cement kilns. But clearly, in British Columbia, our priority wherever possible is to the third "R". But we recognize the fourth "R" does also play a very important part.

I also refer to what I call the partnership with people, and we haven't really heard a lot about that today. But, I think that's an extremely important area, this whole issue of consultation and stakeholder involvement. We're trying to make that increasingly more a part of our strategy in British Columbia. And I must say with strategies like beverage containers, it's certainly a very challenging and often quite a frustrating experience because it's so emotional and there's so many different points of view. But nonetheless, it's extremely important to involve the public, because unfortunately there is a misconception out there about things like incineration. We must get the message out that all four "R"s are important and we must separate fact from fiction.

Also in British Columbia, about fifteen, sixteen months ago, we launched a recycling hotline. During Environment Week in June of 1990, the Minister officially launched a province wide toll free recycling hotline service that's run for us under contract by the Recycling Council of British Columbia. And we're very pleased with the job that the Recycling Council is doing for us. The hotline is staffed six days a week during normal business hours. During the other time, it's on a messenger computer operated service. The hotline is now averaging about nine hundred calls a week. When we launched our tire program, our battery program and now when we launch the waste oil program, it's all going to be tied to the recycling hotline. That is our message in a way to communicate with the people.

We're also spending on the order of hundreds of thousand of dollars this year in what we call an "Eco-education Program. We've got an ECO walrus that's our mascot. We use environmental youth program workers. We are visiting over a hundred elementary schools this year with ECO and we really want to work with the elementary school teachers. We developed a program in consultation with the Ministry of Education, with recyclers, with students, with teachers who are all part of our focus group. We sent every elementary school in the province a binder with

a video, with computer games, and with a lot of instructions of how they can develop an "ECO Fest" to do with solid waste and recycling. That's another way that we get our message across, how we're dealing with things like tires and batteries and waste oil, because we think that the real future in solving the problem is to deal with our children, who in turn are going to help us older folks get on with the new way of doing things. We hope also to announce a province wide bio-medical waste strategy in the next several weeks to a month, whereby all our hospital wastes from across the province will be treated by either one or several central facilities.

In closing, I really appreciate the opportunity to participate in this kind of forum. It's a very healthy sign. The journey though, to zero pollution and reduction, in our municipal solid and hazardous waste stream as identified in our Environment 2001, is going to be difficult and it's going to be challenging.

However, the cooperation and interest shown here today illustrates to me that an economically viable and environmentally acceptable solution is within our grasp. More importantly, it is one of many initiatives required to make our world a better place. Not only for us, but for our children and future generations. Thank you very much!

REGIONAL REPORTS
RAPPORTS RÉGIONAUX

WAYNE WRIGHT

Vice-President, CPPI - Ontario Division

Vice-président, division de l'Ontario de l'ICPP

Thank you René. Let me first thank the Ontario regional group for their very active participation and fine spirit of give and take. Let me set the scene for you. We had about forty plus people, none of them appeared too shy or bashful. We had a short period of time and we met in a bowling alley. Actually we met in one alley of a bowling alley, a long narrow room. But we had a lot of discussions and would quite seriously like to thank the group for a very productive session and also the comment that giving a summary here in 15 minutes of what happened in two half days is sort of up in that category with leaping tall buildings in a single bound, so I'm going to give it a shot. Feel free if I say something really absolutely opposite from what you thought was said, just jump in because it's kind of a tough process. I'm going to use these slides that were prepared as we go along.

What I'd like to do is a two step process. Very quickly I'll give you a summary of the issues we came up with. We came up with five issues or sort of four issues and a partial solution. I'll then take you through each of them on the process of getting to the action plans. We really did have a whole bunch of issues that when we went to attack it later we really found that they condensed down to about five main issues. Consumer education was the first issue with the fundamental issue being how do you get them to bring it back? Just as simple as that. Questions raised under here include; bringing back filters, what about the containers?, the quality of re-refined oil?, is there a communication and education issue to let the consumer know that the re-refined oil is of a high quality in order to close the loop right back around to the marketing phase again. And finally the question of trying to avoid the classification of hazardous.

The second overview issue was in terms of the collection systems, the issue being collector liability. Again the classification question, options for contaminated oil meaning when you truly do have a contaminated drop, at least in Ontario development of options of what you do with that. So, the system doesn't freeze up on you and in that case its related to the liability question.

Quality and supply of the used oil stream, the issue of how to handle geographically isolated and small outlets and the cost in level playing field concept. Continuing the overview, three final issues; the financial issues were raised, there the issues being the financial questions around the old question of who pays? Around the collection system and a reminder that the cost varies. Around the recycle recovery cost of whatever system or technology is there, again the concepts of the level playing field and what's the government role in that?

Item four around end uses. In this group we really addressed the question "are two really needed?", and what are the differing impacts in terms of costs and environmental impact of differing end uses. Finally, issue number five, and as we got to putting out solutions, we kind of really thought that five isn't an issue in the way the others are. In a sense it's one, it's a set of solutions to address many of the other issues. But in the first pass through under the government category we saw issues in concept such as voluntary versus regulation. What is the degree of regulation that the system may require? Again, what are the options for contaminated oil? How do we get a better approach to enter jurisdictional coordination? And again the old friend liability. With those five overview issues, what I'd like to do now is take each of them in turn and kind of walk you through what we did in terms of the potential solutions and then the action steps. What we did to define the solutions is we jotted down, right on these forms, potential solutions as they came up and, and I think I'll show you the action steps that came out of each category at the same time. In terms of consumer education then, the potential solutions that came out were that business essentially markets the concept to the consumer. That there is also a role for government communication, perhaps covering slightly different aspects, or perhaps a joint communication process but certainly where we each know what the other is doing. A consistent message came up consistently as an important issue. Another important point as a solution, was the proposal to make sure we learn from or perhaps expand existing programs that are already out there in consumer education. We became aware that we are trying to re-invent the wheel for an area where there's lots of material out there. Let's take advantage of it.

And finally, a comment, can we use the education system in order to get some of this broad conceptual information disseminated on used oil and what you do with it? To complete issue one, our action plan consisted of this page. What we said we needed here is a joint industry/government task force on a communication program. And we felt that by broadening it to a communication program, it could be the specifics of how the collection process will work, it could be knowledge of why you as a consumer really ought to participate in bringing your oil back to a depot or some type of location, so it could be broad based or very targeted. But it should be joint because it needs to be consistent and there will likely be somewhat differing roles of what individual businesses want to carry out and what government wants to carry out, and perhaps what industry associations want to carry out. The responsibility for that will fall on CPPI representing all of industry in taking the lead on behalf of the stakeholders and the Ministry of the Environment, and we looked at the end of this year to get this action item kicked off and moving.

The second specific action step was a study or survey of the existing programs to make sure that we don't go out there and re-invent the wheel when there's a good base already out there. Again the end of this year for a phase one (1) and then there would likely be a phase two (2) when we talk about what will the actual communication program that we want to take forward be. The stakeholder base would probably be broadened beyond CPPI and government dialogue. It would

certainly extend formally to the government and perhaps other stakeholders at that point. So that was our package around the first issue which was consumer education.

The second is the collection systems themselves. We could certainly have gone on with this for a long time. You could almost view this list as partial list before we decided that we were gonna run out of time if we continued to list all the items up here, but certainly we said we need a practical disposal method for hazardous substances. We need a program to minimize the likelihood of contamination. We need to ban unsupervised public locations where the public can just deliver materials. We need to learn from previous experience. Again there are programs operating out there. We want to try to avoid the hazardous substance designation and the connotation of that. We need to maintain the small volume exemption. This is an Ontario issue. There is already an exemption for service stations in small volumes and perhaps expand that. In terms of accountability for the collection system, the group reached a very strong consensus that there would be no exemptions. There would be no retail exemptions to participate in the collection program. Again, that doesn't mean everyone that has a selling point needs a collection system there, but there is no exception to be accountable to providing a system that the consumer can return used oil when you have supplied him the original oil product. Develop the understanding of the obligations to collect from the consumer and an education program, perhaps around the WHMIS aspect for the collectors who will be set up across the province. In terms of the action required for this one, the approach is: one, to prepare a position paper on collection system options. And that is to look at what is out there, for CPPI to take the lead on that with something like a six month time frame to complete. And that a second phase with an industry task force, CPPI led, to flesh out the options around the collection system.

Turning to the financial issues, the two key points : one, who is going to pay for the level playing field, and what's the government role? It's going to be paid for by all the marketing participants, the industry is accepting product stewardship. And as sub-point, no-cost to the consumer to return, and then the question of government regulation to ensure that everyone participates.

The consensus that the room seemed to reach was that around the financial issues there isn't a lot of disagreement on who is going to pay for it. Industry, all participants, have said they are willing to pay for it, the question is, "How do we just get this thing started?". We need regulation or Memorandum of Understanding, some encouragement or some action by government to ensure that we will have a level playing field, and thus to get that first person to take a step forward.

End uses. It wasn't a major issue in Ontario because of the structure within the Ontario market itself. We really just need some clarification by government on acceptable uses currently. MOE should have that accountability and to carry that accountability out within six months. And then from that there may be a second phase to develop. Do we want to change anything within the system? At this point in time the options for Ontario are not one of the primary blocks.

The final issue then, on the government itself. We started listing solutions and we had government regulation to ensure everyone participates. And then we had what we really need is a "Memorandum of Understanding" which will lay out industry role and government role, and then we had that we need a government announcement of the intent to regulate because even if they don't regulate we need to tell people that they might regulate so that we can get this thing going. And we needed help in terms of modifying the options for contamination and the concept kept coming up in terms of the inter-jurisdictional coordination that utilizes the CCME route. When all was said and done, and we really talked about it, we said well wait a minute maybe we're not entirely sure that government regulation is a strong consensus of the room, that we really do want to go that way. Let's start with a Memorandum of Understanding. And that's our final slide and comments on an action step.

What we said here was that we need to draft a Memo of Understanding and that will be a joint industry/government task force. And that will be the waste management branch, with CPPI taking the lead with the first phase and a three month time-frame, and then a second phase once we have the shape of the Memorandum of Understanding, probably another six months following that. Remember for one of the previous pages it was already one other joint task force between industry/government on the issue of communication. They were seen at this point, as separate enough issues that they would be kept separate initially but might very well be combined together. To prepare the options for contaminated oil, the government will take the lead on Phase I (one) which is essentially to say "well let's make sure we all understand what the options are now". And then secondly, do they need to be expanded and that would be a Phase II (two) taking a longer period of time because there would be a lot of consultation in that phase and that would involve government, collectors and the sellers. Finally the recommendation, take this workshop summary to CCME in November!

GLEN MYERS

Vice-President, CPPI - Western Division

Vice-président, division de l'Ouest de l'ICPP

To give you an idea of the process we had thirty five people in the western group and I think one of the problems that we started out with, there's six jurisdictions when you take the four provinces, two territories and really when you take the federal jurisdiction in the north there's seven, which is as much as the rest of the other parts of the country. So it really wasn't practical to sit down and say that we were going to do each jurisdiction and set out a specific timetable so we developed a generic approach to this.

Now the other part of the process that we used, I think a little bit different than the other groups, we broke into five groups, five work groups and we issued each group what we called a critical issue and those are the critical issues on that slide that each of the tables had to work with. There was about six to seven people at each table, and we threw out some questions within the framework of each of those critical issues as a start of the dialogue. And I'll show you the outcome from that and obviously René is going to keep me to my allotted time-frame so I'm gonna have to go rather quickly and I don't intend to hit every item on these sheets because there's a fair bit of information, but I'll try to cover the key highlights that came out of each of the discussion groups.

Our first critical issue was end use of collected oil. And if you see under the solution really there's three. One, we started out with re-refining and energy recovery as the key items but we were reminded by some of the people at the tables that clearly one of the first options should be for reduction. So, we put that down there and the other two are items that there was a fair bit of discussion, some differing views, but at the end of the day there was consensus that the next options would be re-refining and energy recovery whether that's in a cement kiln or in an appropriate heating device. There was consensus that we would not regulate that end use though. In other words, there is not to be a regulation that says the first priority has to be re-refining. We would let the market forces determine which of the two and three options would be the appropriate ones. There was a consensus that there should be some regulations though on things that you could not do with used oil. In other words, there should be regulation that there shouldn't be road oiling, shouldn't be able to dump it down the sewer or take it to a landfill and dump it in there and a number of others that come out. So, that is an area that there was a consensus that we should have regulation on. And there was a lot of discussion and you'll see on one or two of the other slides that I throw up, the classification of this commodity should not be under the name of a hazardous waste because of the connotation that leaves with the public. So that's another strong recommendation that came out for government responsibility in that particular area.

Also, there was feeling that collection needed to be monitored in there, there should be manifesting within collection systems and that there should be no opportunity if you do get some contamination within a batch that you can dilute it and then bring it down below the regulated level which can be used in some other fashion. And there was some discussion about the need for secondary content, and really what we mean by that is, ending up taking the re-refined oil and applying that in re-blending into finished motor oils. The consensus on that one was that it should not be regulated, that the market should play it's proper place but there should be support by endorsement of a need to utilize this in finished oil.

In some of the actions required, you can see in there on the area of re-refining and energy recovery there are a lot of initiatives that are in place in the west and a lot of discussions going on within industry right now on whether new re-refiners should go in and we felt those were industry initiatives. They should be market driven but there should be a requirement, or there is a need to be able to start this collection process that you need an opportunity to move this material in there, and most likely that would be into cement kilns or heating operations that were environmentally sound because you need it to get these going so you can start collecting and then build up enough volume where it would be economic to justify re-refining plants. So that was the first issue and as I say broad generic comments in terms of responsibility and action plans that we came up with.

We had a lot of discussion on this next item on proper management by the generator which is another critical issue in there, and I'm just gonna talk to themes on this. The discussion went along somewhere like initially that there should be a regulation forcing the generator and we focused on this one on the generator to make sure that oil was returned. I think at the end of the day, we got to the point where we said that should be a soft regulation saying that it is irresponsible or words to that effect to dispose of oil into the environment in a harmful fashion. Now there was a dispute on that also, and I believe at the end of the discussion that the words on that slide and the intent of those is that there is a minimum volume where there should be some registration. In other words, if you have a very significant volume of oil there probably should be some registration process so that there could be tracking of that, while for the smaller do-it-yourselfer that there should be some type of comment in regulation but it really shouldn't be a hammer, but there should be some prohibitions so that oil couldn't be indiscriminately disposed of. So again, a rather generic approach to that issue but again, consensus from the group after a fair bit of discussion.

On the collection system, the group that were working on this spent about three hours and went round and round but at the end of the day they did come up with some consensus on this particular item. Again, the issue about what they should call this material, whether it's a hazardous waste or not, again the feeling that there should be a national classification of this and we should keep it out of the hazardous waste category and again, needs for licensing local collection companies, manifesting is required in that particular area and again, responsibility of governments.

We get into this whole area of cost, we have another slide called financial. And again, there was a clear consensus it is industry's responsibility for the cost of this program. That's very easy to say but there are still some practical realities for the person that ends up collecting this oil. He is going to have to do some contracting or making some financial arrangements with the collector and they are going to have to come to some understanding of what it's going to cost, whether it's 5 cents a litre, 10 or 20 cents a litre to collect this oil. And obviously there are likely to be volume discounts. Well if the collector doesn't know how much oil he's going to get back, and undoubtedly until the program is in place for a while he isn't going to know that.

So there are issues, practical issues in the area of knowing how to make commercial arrangements for collecting, and paying the collector of oil. And there was a discussion that there are possibilities that maybe the major sellers and the independents come to some arrangements in terms of their commercial arrangements amongst each other. There maybe another approach, and I know we talked for about a year about this in B.C., about having an independent authority which would collect this money. And each of those obviously has its problems but the people that are involved are going to have think about this quite closely. It is a very practical issue that is going to have to be dealt with. The issue of collections in large communities, again that's reasonably straight forward. There has to be appropriate number of these that are reasonably spaced so that it's convenient for the consumer to bring that oil back. But, when you get into these remote communities it may be that the logical opportunity is to combine your efforts and have a single location that may be the convenient place in town which might be a municipal dump or some other area. So again, there are practical issues that vary depending whether you're in a urban community or you're in a very remote community, in one of the provinces or in the northern part of this country.

Liability issue, I know had a great deal of discussion over the last year in the work that we've been doing in the west and again in the group that was working this issue who they had a lot of discussion because I guess the original position is we would like government to share that or take over that cost because when the oil comes out of the automobile it's not in a state that is truly a major problem in terms of being hazardous material. There's a possibility for contamination which could cripple a small independent owner if he had to take that liability on. I think government's position in this discussion is clearly 'well we are not about to pay for that', but the discussions that ensued in this workgroup, I think ended coming to a consensus that if government would amend or provide regulations where there was a reasonable outlet at a reasonable cost for this material, that would fundamentally take care of this liability issue. I mean, there will be exceptions to this no doubt, but today certainly the ability to take material is very very limited in there so we really see that it is government's role to provide a list and provide the appropriate regulations such that if a collection site gets a contaminated batch of oil they do have a reasonable and appropriate outlet to put this material to, without actually crippling them. So, at the end of discussion there was a general feeling that if that would happen that could go a long way to solving this liability issue. And I'm sure that there are obviously certain items still of concern for some people. The other one that government should lead

in, is providing and publicizing other options for disposal for pesticides and these other contaminants that maybe people want to get rid of in the used oil. We obviously have household hazardous waste days but if people know about and understand where they can take some of these other contaminants, hopefully they're not likely to put those into the used oil.

The financing, as I said earlier in there, there was unanimity that industry bears the cost for this program. It's the cost for doing business, and I guess the key issue on here is that the industries that have to bear this cost feel that they would like a level playing field and make sure that all who are participating bear a similar cost so that the market place is not distorted.

I think our final item on the critical list that the last group worked on was public awareness. Obviously, this was felt to be a very key and important part of any program that was going to work and be effective. There was an issue where it is felt that there should be a generic message that's developed which would communicate consistent detailed information. Again, as a package it was thought that this should be a CPPI responsibility and this material then could be used and passed out. If you go down to the next issue, a specific message should be delivered by each seller. In other words, each person, each company, independent, whoever else is involved in this business would want to develop their own specific package and material in there and they could use this generic message for developing that. If they were too small of a player in the sense that this would be very costly they may just want to put a stamp on the CPPI material and say: 'Hey, this is company X's material but it would use the generic message in developing specific message for sellers as they chose.

There's another item, this third item here, national consistency of information packages in here and there's some discussion on that, that it would be desirable for CPPI to develop a standard set of regulations that could be past out to national or provincial bodies to consider when they're developing regulations and I think I heard the Ontario group talking about that a little earlier also.

And the message should be delivered by each seller. In other words, each person, each company, independent, whoever else is involved in this business would want to develop their own specific package and material in there and they could use this generic message for developing that. If they were too small of a player in the sense that this would be very costly they may just want to put a stamp on the CPPI material and say: 'Hey, this is company X's material but it would use the generic message in developing specific message for sellers as they chose.

There's another item, this third item here, national consistency of information packages in here and there's some discussion on that, that it would be desirable for CPPI to develop a standard set of regulations that could be past out to national or provincial bodies to consider when they're developing regulations and I think I heard the Ontario group talking about that a little earlier also.

And the last item on here was also one that I believe Wayne talked about earlier in there that bringing this to the CCME agenda would be a very appropriate and timely thing to do.

So that covers in it very general terms. There was certainly far more information than I've been able to deal with in a short time-frame. If any of my colleagues in that workshop want to add to, or correct me where I've not covered their feelings appropriately please shout out now. But I think there was a general feeling from a number of people that I talked to that the workshop provided a good opportunity, I'm talking about our western one to exchange ideas and raise the awareness of some of the general issues. But there's a lot of practical issues that we dealt with also. Thank you!

LES STEWART

Vice-President, CPPI Atlantic - Division

Vice-président, division de l'Atlantique de l'ICPP

With the assistance of Kerry, we are going to take you through the results of our workshop. And before we start to do that I'd like to acknowledge those who were in our workshop. We had a great bunch of people from all sectors, in most cases everyone quite informed on the issue. Pretty well representatives of all stakeholders were there and we had everyone participating including the Minister himself who rolled up his shirt sleeves and spent the whole workshop with us and made an enormous contribution. I don't see him, I think he must of left but he was in there pitching as well as the rest of us.

We identified seven issues as you can see on the screen. First of all the necessity for having an effective collection framework or system. We identified the need to deal with generator or user responsibility. We also identified acceptable end use options as an issue, liability, education and public awareness, and the role of governments.

The seventh one, we identified in the beginning as an issue. And what we found as I just heard Glen say the issue of financing sort of was interspersed throughout several of those particular issue so we dropped it off at the end the day and we are reporting back here on six issues.

To start with, the collection system issue. We felt that the solution to that were the sellers to be responsible for providing a return opportunity or return mechanism for the people that they sold the oil to. First of all, I'm going over to the comment side, first of all at the locations from which the oil was sold or nearby or by some kind of a contractual arrangement. In addition, we said there was probably an opportunity to provide storage at municipal sites, and in particular manned municipal sites. One of our collectors and re-refiners, to illustrate that point said; 'if sellers, for example, were to have a tank in the yard unmanned and people were just arbitrarily dumping in whatever they felt like, he wouldn't be picking it up'. Also, as part of the solution to the collection system, we thought that there was a need to ensure some regional consistency and there we are referring to consistency throughout the four Atlantic provinces. And ideally, maybe even some national consistency. But that maybe just too idealistic but never-the-less we noted it as a comment. And we felt that the whole issue of the collection system or framework should be financed through the market, through the market forces.

Dealing with the second issue which is generator responsibility, we felt that the solution required: number one, that the user return the oil to an approved facility. We're not talking here of how that should be done or how we should try to make that happen but we felt the oil must be returned to an approved facility. It must be returned in a non-contaminated condition. We felt there was a need for contamination to be defined by regulation, again to ensure consistency from jurisdiction to jurisdiction. And we thought that there would be some benefit if a toll free number

existed, or reporting mechanism at least, whereby violators/abusers of that objective, or even those in need of information as to how to dispose of oil had an opportunity to do that. In the Atlantic we felt that some appropriate end uses already exist and that there is a re-refinery in the Atlantic provinces. There's another at the possibility stage. There are cement kilns, there are three, throughout the Atlantic provinces all now using lube oil as a source of fuel. Strong recommendation from the collectors was that to ensure a value on the end product or the used oil, there was a necessity not to limit the end use options to a few, but to maximize, supported by scientific data, the number of options that are available. They felt that this would increase competition for the product and probably attach a better value to the product which in turn would help fund the difference that now exists between the cost of doing business and what they in fact recover. We also felt there was a need to re-evaluate, take another look at the existing options to see if they are acceptable or if some, in addition to those that have already been banned should be banned.

This was quite an interesting one. I think a lot of us had gone to our workshop expecting a lot of debate on this. The solution proposed here and unanimously agreed to in our workshop, was that the liability issue had to be dealt with in terms of the contractual relationship or business agreement that existed between the collector and the facility operator or the place from which the used oil was picked up. The normal tests for contaminants, samples and testing should take place and that there seems to be minimum, if any, role for government to play in terms of underwriting liability. This is coming in from people who are quite experienced in the collecting and in the final disposition of the product.

The next one was public education or public awareness. We felt that should be dealt with in three components. We felt there was a need for national education. We didn't try to define what format that should take, generic probably in the case of national with the responsibility for it being the federal government and industry. At the provincial level a better appreciation of regulations that currently exist.

Some provinces do a better job than others of explaining why they introduce regulations, what the end objectives are of those regulations, while others don't do a very good job at all. So there's a lot of misunderstanding and confusion within the public domain as to just what the regulations are intended to do. And finally, P.O.S. material, we're referring there of course to the need for the appropriate materials being in place where the customers buys his lubricants to start with, and the responsibility for that would fall to the retailer or the supplier.

Some governments were encouraging not too much role for government in this program. And I think also that was the objective of CPPI when the plan was decided. We identified a large number of areas initially in our workshop where we thought the government could play a role, but we finally ended up reducing it to those areas you see there. First, there is certainly a need for some regulations on the part of governments particularly when it comes to endorsing end use options. Secondly, when it comes to establishing what the seller responsibilities are. Third, in classifying the product as a non-hazardous waste and in ensuring regional consistencies within

the Atlantic provinces. Basically what we're saying here is that government should talk to each other and communicate and not maybe draft their own regulations in isolation of each other.

We felt another solution in that area was certainly the need for education. We felt there was a big role the governments could play there, as we have said a bit earlier. Need for consultation with each other and with the stakeholders who are impacted by legislation. A role for governments to play in terms of establishing quality standards and in monitoring or auditing for compliance with regulations.

Now we're dealing with the action plans and the first issue we dealt with there was the issue of collections. We felt the responsibility for the development of the collection system rested first and foremost with the seller. We felt there was a need for the provincial governments to regulate the provincial return system whether that were to take the format of registration of underground storage tanks or licensing. We also are in a position where Newfoundland now have regulations about to be released which includes the licensing or registration of underground or storage systems for return of oil in the regs. Nova Scotia and P.E.I. would expect to have them in place by 1992 and New Brunswick are just getting on with that particular issue and they expect at the earliest that such regulations would be in place would be 1993.

The second item there is when would the system be fully operational? We felt it would take from the time that legislation would be produced, 1 to 2 years before the system would be fully operational but there was nothing to prevent a voluntary compliance in advance of that date which is currently happening.

The action plan for generator responsibility. We felt there was a need to educate the generator, the user on the consequences of inappropriate indiscriminate disposition of oils, and what the impact is to the environment and to the sub-terrain. We felt that we put that first because we felt that following a better awareness, a better understanding of the issue, there was no excuse for the user or the generator not to return the oil in a non-contaminated condition. We felt the responsibility for the first by the way for education was through government and suppliers and should be starting immediately and of course the responsibility for returning uncontaminated product fell to the user. And it should be happening now.

At the last solution we proposed that we should stop or at least reduce improper disposal or the generator should stop or at least reduce improper disposal immediately and the action that might help that would be the reporting of violations through provincial department of environments by use of the toll free number.

Prohibit unacceptable options. Let's stop and prohibit unacceptable options and we think that will take regulation and it requires the provincial government to do it. The timetable for doing that would be the same as in issue number one and Newfoundland, Nova Scotia and P.E.I., are now doing that to a certain extent. We think a revisit to the issue and maybe looking at banning further unacceptable options would be desirable. As I said earlier on the liability side, a bit of a surprise to us but there was no special underwriting of liability required. The solution to that one rests with the collector through good business practices.

On education and public awareness, as I've said when I identified the solution, we felt there was a need for a national/provincial/point of sale campaign along the lines as I've shown there, national it should be federal and industry where as industry we could refer to CPPI. It should happen quickly, it should start immediately and be done by 1992. Provincial and industry should deal with public awareness within the provinces and the point of sale is a function of conducting good business and it would be an arrangement agreed to between the sellers and the suppliers. We felt there was an opportunity to identify containers, provide some education to that means and we also acknowledged that we haven't spent any time of the workshop talking about what to do with containers and filters. It's an issue that's being worked on in another forum and it's an issue that requires resolution through certainly the provinces and the industry.

The role of the government. We felt the removal of hazardous waste designation was important. We felt that could be done through regulation at the provincial level and it should happen 92/93. We felt that we have to, there has to be some communication between the provincial regulators and the feds, particularly where oil is identified on the priority substance list. We wish or we suggest that the governments should maximize acceptable options for the reasons I described earlier. That should be through regulation. The objective in so doing, to maximize the benefit with the value of the product. We felt there was a need at the government level to harmonize quality standards, to establish quality standards in so doing harmonize their individual activities with each other.

And finally, compliance monitoring. Within the four Atlantic provinces regulations will be in place and I guess their effectiveness will be on how effectively the provinces do monitor compliance or suggesting that shouldn't limit voluntary industry compliance or monitoring.

And finally, Kerry and I just wanted to thank and congratulate our workshop for a good job. Thank you!

RENÉ MIGLIERINA

Vice-President, CPPI Quebec - Division

Vice-président, division du Québec de l'ICPP

Ici au Québec, nous sommes un peu dans une situation différente. Depuis plus d'un an, il existe une table québécoise de concertation sur les huiles usées qui se réunit chaque mois et qui nous offre l'occasion de discuter. Pour la plupart d'entre nous, la réunion de ce matin et celle d'hier ressemblaient plus à une autre réunion du «Old Boys' Club». On répétait souvent des opinions déjà formulées. Nous avons constaté que sur beaucoup d'enjeux, il continuait à y avoir deux écoles de pensée. Sur beaucoup d'autres, nous faisons l'unanimité. Nous préparons actuellement un mémoire qui devrait être présenté, avant la fin de l'année, au ministre de l'Environnement du Québec. Ce sera un espèce de «State of the Union Message» sur les huiles usées au Québec et dans le monde. Ce sera très intéressant pour nous puisqu'il s'agira là d'un autre pas en avant. On a identifié des enjeux, en fait les enjeux dont on parle depuis un bon bout de temps. Vous constaterez que ces enjeux ressemblent grandement à ceux que nos collègues des trois autres groupes ont trouvés.

Nous avons parlé de sensibilisation et incitation des consommateurs, systèmes de collecte, débouchés, le marché des huiles reraffinées. Nous avons aussi touché à des aspects qui n'ont peut-être pas été touchés directement ailleurs, soit le financement des dépenses publiques, s'il y en a, et l'aspect réglementaire. Je dois vous dire tout de suite que sur six sujets, nous n'en avons couvert que quatre et demie.

Parlons de la sensibilisation et de l'incitation. On a abordé le rôle de "leadership" de "RECYC", une société de la Couronne. On a parlé du rôle de leadership que cette société devrait avoir. En fait, son président étant parmi nous, il a été d'autant plus facile de lui transmettre le message. On a dit que nous devrions d'abord dire aux gens pourquoi ils ne devraient pas jeter cette huile usée dans l'égout ou dans le champ au coin de la rue. On a dit qu'il faut absolument leur dire qu'il faut rapporter les huiles usées : comment, à quel endroit, et de quelle façon. Le programme devrait aussi les inciter à acheter le produit reraffiné et lui dire qu'il est d'aussi bonne qualité.

La sensibilisation ne devrait pas être ce qu'on appelle en français un "one shot program", mais ça devrait être un programme continu. On a ensuite parlé de la nécessité de clarifier l'incompréhension envers la valorisation énergétique. Dans ce cas-là, on pensait aux cimenteries surtout. On a parlé d'un système de collecte et de la nécessité de responsabiliser les vendeurs. En fait, c'est à peu près équivalent au programme de l'ICPP. Tous ceux qui vendent des huiles à moteur doivent participer à la collecte. Il faut aussi des installations sur place ou situées à l'intérieur d'une distance convenable. On a dit que ça devrait être reconnu, exigé avec le permis du détaillant; parce qu'au Québec, tous ceux qui vendent des huiles à moteur doivent

demander un permis au ministère de l'Énergie et des Ressources. L'entreposage, lui, devrait être réglementé. En fait, c'est déjà commencé dans notre nouvelle loi sur l'utilisation des produits pétroliers qui affecte aussi les réservoirs souterrains d'huiles usées. Responsabilité pour les gros producteurs de gérer ça avec sécurité et en pensant à la santé publique aussi.

Et puis, on a discuté, sans toutefois en arriver à une conclusion, du contrôle de la qualité. Il y avait deux écoles de pensée. Si les huiles sont contaminées, est-ce que c'est le gouvernement qui s'en occupe ou est-ce celui qui les reçoit, que ce soit à la station-service ou chez tout autre détaillant? Ou est-ce plutôt celui qui apporte les huiles qui est responsable? On n'a pas réglé cette question-là.

On a parlé ensuite des débouchés. Nous favorisons deux débouchés au Québec. Le recyclage qui est le reraffinage et également la valorisation énergétique en pensant surtout aux cimenteries du Québec. On dit que dans un cadre de développement durable cependant, il faudrait favoriser le reraffinage par des incitatifs réglementaires et fiscaux, laissant au gouvernement ce rôle-là.

On a parlé du marché des huiles reraffinées. En fait, il s'agit probablement là de la clé : on veut stimuler la demande. Ça peut se faire par la promotion auprès des consommateurs. En fait, c'est notre recommandation. Ensuite par des politiques de contenu qui pourraient forcer les manufacturiers à avoir un certain contenu d'huiles usées dans leur stock de base. Là encore, il y avait quelques écoles de pensée. Pour certains, les parcs-autos des gouvernements pourraient commencer à donner l'exemple en se servant d'huiles reraffinées. Les manufacturiers d'automobiles pourraient aussi faire davantage. Par exemple, une des suggestions voudrait que le remplissage initial des automobiles neuves à la manufacture soit en huiles reraffinées.

On a parlé de financement, et c'est peut-être là qu'on a passé le plus de temps. De quelle façon le gouvernement devrait-il voir au financement des dépenses publiques? On a parlé de taxe parafiscale comme il en existe en France. C'est-à-dire que les fonds des taxes sont versés dans un fonds spécial pour un usage spécifique. On a parlé d'une taxe spéciale sur les huiles lubrifiantes. Là le danger, c'est que ça disparaisse dans les fonds généraux des gouvernements. On a parlé de la consigne. J'ai souligné ce point dans mes notes parce qu'il y a vraiment deux écoles de pensée. C'est qu'il y a des gens, on a entendu en fait M. Darbelnet, et on vu sans doute dans Le Devoir d'aujourd'hui que le CAA recommande une consigne sur les huiles. Certains croyaient que ce n'était pas nécessaire. Nous n'avons pas résolu ce point-là. La discussion va continuer à la table québécoise de concertation sur les huiles usées.

Comme je vous le disais, ce n'était pas pour nous une fin, mais plutôt un autre pas vers la présentation d'un mémoire global au ministre de l'Environnement du Québec avec la table québécoise de concertation sur les huiles usées. Je vais vous parler des organismes qui en font partie. Il y en a douze : le CAA-Québec, la Fondation québécoise en environnement, l'Association des détaillants d'essence du Québec, l'Association des dépositaires d'automobiles du Québec, le ministère de l'Énergie et des Ressources du Québec, le ministère de l'Environnement du Québec,

le ministère de l'Industrie et du Commerce du Québec, l'Union des municipalités du Québec, l'Association des municipalités régionales de comtés du Québec, l'Association des concessionnaires de Canadian Tire au Québec, SNC Lavalin (qui est là comme une compagnie qui a annoncé des plans pour ériger une reraffinerie) et l'ICPP.

Donc c'est une table de concertation qui est très intéressante. Je vous recommande de relever le même défi dans vos provinces. Vous allez voir que c'est pas facile de rassembler les écoles de pensée et les points de vue différents. Je vous remercie infiniment, vous avez été un auditoire parfait.

CLOSING REMARKS
DISCOURS DE CLOTURE

CLAUDE BROUILLARD

President, CPPI

Président, ICPP

By all counts, I believe that the workshop has been a success largely because of you all. You've been a great audience. You've listened actively, you've been on time and you've participated fully in the discussions.

Un grand merci à tous et mes félicitations les plus sincères. Le succès du colloque est dû à votre participation active. Ce fut votre colloque. Vous l'avez utilisé à plein et je pense que l'on peut commencer, dès ce moment, à en voir des résultats. Je me dois de souligner la part considérable de nos conférenciers invités : Mme Lorette Goulet et M. Michael McNeil.

La ferme volonté de tous les participants à arriver à des solutions rapides, pratiques, économiquement réalisables, ça aussi à mon avis, c'est un des faits critiques de ce colloque. Je crois que nous sommes tous d'accord que la fin du colloque est vraiment le début d'une concertation entre les gouvernements, l'industrie, les utilisateurs et tous les autres intervenants.

In summary, the overwhelming feeling of the workshop appears to be the necessity for action. All workshops also identified, in one way or the other, the need for constant communication, for public awareness. To support this recommendation, CPPI is prepared to publish and distribute a newsletter which would be specifically designed to this issue. Its purpose is basically to gather information, tips, suggestions, that are developed in one part of the country and could be useful in another part of the country. Just between us here, and I wouldn't want that to get out, but it's basically a subtle form of pressure. Keep it up, we've got to! I think the will of the people is here but I think we've got to make it happen.

I've discussed this very briefly with Tony Clarke of Environment Canada, and he's enthusiastic about the idea, wants to co-sponsor this newsletter. I also invite any of you that would like your organization to be formally identified with this effort to let me know and we could develop a rather nice coalition, almost an irresistible force.

The second point that I would like to suggest is that we work starting immediately towards the establishment of provincial multi-stakeholder committees, where required. And again CPPI, through its divisions, its regional divisions is prepared to support this effort. The purpose of course would be to bring one step

further, the excellent discussions that have been held today, the reports that you heard from the regional workshops with the emphasis on the workplan and action plan, I think is heading in the right direction.

Finally, you heard the Ontario report where they want action taken with CCME immediately at its next meeting in early November. I discussed this issue with Minister Clements who is the past Chairman of CCME and I mentioned to him well, "what would be the best way to make sure that CCME tackles this issue?", and I suggested that perhaps we could prepare a short paper outlining the issues and some of the action items we would like from them and he said: Don't waste your time, call the Chairman, John Leefe. He already knows about it, he's on your side and we now know of course that we have the federal delegation as well on our side and they will be taking over the leadership for the next year as of this meeting. So, I think that with all of these activities, it bodes extremely well.

Again it remains for me to say: "Bon Voyage! Safe return home! Thank you very much for coming and also for participating so well to this meeting. I thank you all!"

ONTARIO WORKSHOP

ONTARIO REGION WORKSHOP - ISSUES

ISSUES	DESCRIPTION	COMMENT / PRIORITY
I. CONSUMER EDUCATION	<ul style="list-style-type: none"> • BRING IT BACK • INCENTIVES • EXTRAS - FILTERS, CONTAINERS • QUALITY OF REFINED • NON-HAZARDOUS 	13 12 14 17, 16 2
II. COLLECTION SYSTEMS	<ul style="list-style-type: none"> • COLLECTOR LIABILITY • CLASSIFICATION (NON HAZARDOUS) • OPTIONS FOR CONTAMINATED OIL • QUALITY, SUPPLY • GEOGRAPHIC / SMALL OUTLETS • COSTS / LEVEL PLAYING FIELD 	18 2 20 1 11 5
III. FINANCIAL ISSUES	<ul style="list-style-type: none"> • COLLECTION - COST VARIES • RECYCLE/RECOVER COSTS • LEVEL PLAYING FIELD • GOVERNMENT ROLE 	19, 4 19 5 7
IV. END USES	<ul style="list-style-type: none"> • TWO NEEDED ? (DEFINITION) • DIFFERING COSTS / ENVIRONMENTAL IMPACT 	6, 9 10
V. GOVERNMENT ROLE	<ul style="list-style-type: none"> • VOLUNTARY vs REGULATION • DEGREE OF REGULATION • OPTIONS FOR CONTAMINATED OIL • INTER-JURISDICTION COORDINATION • LIABILITY 	7, 21 5 20 8 18

ONTARIO REGION WORKSHOP - SOLUTIONS

ISSUES	SOLUTION
	COMMENT/PRIORITY
<p>I. CONSUMER EDUCATION</p> <ul style="list-style-type: none"> • GET THEM TO RETURN IT • INCENTIVES • NON HAZARDOUS • QUALITY OF REFINED <p>II. COLLECTION SYSTEM</p> <ul style="list-style-type: none"> • LIABILITY • CLASSIFICATION • CONTAM. OPTION • LEVEL FIELD • GEOGRAPHY / SIZE <p>III. FINANCIAL ISSUES</p> <ul style="list-style-type: none"> • LEVEL FIELD • GOVERNMENT ROLE <p>IV. END USES</p> <ul style="list-style-type: none"> • DEFINITION • TWO NEEDED • DIFFERING COSTS/ENV. IMPACT <p>V. GOVERNMENT ROLE</p> <ul style="list-style-type: none"> • DEGREE OF REGULATION • VOLUNTARY vs REG. • OPTIONS FOR CONTAM. • INTER-JURISD. COORD • LIABILITY 	<ul style="list-style-type: none"> • BUSINESS "MARKETS" IT • GOVERNMENT COMMUNICATES: CONSISTENT MESSAGE • LEARN FROM / EXPAND EXISTING PROGRAMS • EDUCATION SYSTEM - USE • NEED PRACTICAL DISPOSAL OF "HAZARDOUS SUBSTANCES (PCB / PESTICIDES / ETC) • PROGRAM TO MINIMIZE LIKELIHOOD OF CONTAMINATION • BAN UNSUPERVISED PUBLIC TANKS • LEARN FROM PREVIOUS EXPERIENCE • AVOID HAZARDOUS DESIGNATION • MAINTAIN SMALL VOLUME EXEMPTION (EXPAND ?) • NO RETAIL EXEMPTIONS TO COLLECT • DEV. UNDERSTANDING OF "OBLIGATIONS" TO COLLECT • EDUCATE RE: WHMIS • PAID FOR BY ALL MARKETING PARTICIPANTS • NO COST TO CONSUMER ON RETURN • GOV'T REG. TO ENSURE EVERYONE PARTICIPATES • SEEK ACCEPTABLE FUEL USES FOR USED OIL • GOV'T REG. TO ENSURE EVERYONE PARTICIPATES • MEMORANDUM OF UNDERSTANDING <ul style="list-style-type: none"> - INDUSTRY ROLE - GOVERNMENT ROLE • GOVERNMENT ANNOUNCEMENT OF INTENT • MODIFY OPTIONS FOR CONTAMINATION • UTILIZE CCME ROUTE

ONTARIO REGION WORKSHOP - ACTION PLAN

ISSUE	ACTION REQUIRED	RESPONSIBILITY	TIMING	COMMENT/ PRIORITY
I. <u>CONSUMER EDUCATION</u>	<ul style="list-style-type: none"> • JOINT IND/GOV'T TASK FORCE ON COM. PROGRAM • STUDY / SURVEY OF EXISTING PROGRAMS 	<p>M.O.E. / CPPI</p> <p>CPPI</p>	<p>END 1991</p> <p>END 1991</p>	<p>BROADEN FOR PHASE II</p> <p>- INCLUDE OTHER STAKEHOLDERS</p>
II. <u>COLLECTION SYSTEMS</u>	<ul style="list-style-type: none"> • PREPARE POSITION PAPER ON COLLECTION SYSTEM OPTIONS • INDUSTRY TASK FORCE - CPPI LEAD 	<p>CPPI</p> <p>CPPI</p>	<p>6 MONTHS</p> <p>6 MONTHS</p>	
III. <u>FINANCIAL ISSUES</u>	<ul style="list-style-type: none"> • SEE GOV'T AND MEMO OF UNDERSTANDING 			
IV. <u>END USES</u>	<ul style="list-style-type: none"> • CLARIFICATION BY GOVERNMENT ON ACCEPTABLE USES 	<p>M.O.E.</p>	<p>6 MONTHS</p>	
V. <u>GOVERNMENT ROLE</u>	<ul style="list-style-type: none"> • DRAFT MEMORANDUM OF UNDERSTANDING - JOINT IND/GOV'T TASK FORCE • PREPARE OPTIONS FOR CONTAMINATED OIL <ol style="list-style-type: none"> 1. NOW 2. EXPAND ? • TAKE W/S SUMMARY TO CCME IN NOVEMBER 	<p>WMB, CPPI</p> <p>GOVERNMENT COLLECTOR/ GOV'T/SELLER</p> <p>TONY</p>	<p>PHASE I (3 MONTHS)</p> <p>PHASE II (6 MONTHS)</p> <p>PHASE I (6 MONTHS)</p> <p>PHASE II (9-12 MONTHS)</p> <p>NOVEMBER</p>	
(JOINT T.F. ON COMMUNICATION)				

WESTERN WORKSHOP

WESTERN WORKSHOP - ISSUES AND SOLUTIONS

END USE OF COLLECTED OIL					
ISSUE	SOLUTION	ACTION REQUIRED	RESPONSIBILITY	TIMING	COMMENT/PRIORITY
END USE	1. REDUCE 2. REREFINE 3. ENERGY RECOVERY - CEMENT PLANT - HEATING	• IND. INITIATIVE TO PROVIDE MARKET DRIVEN SOLUTION • CREATE VOLUME TO JUSTIFY REREFINING	• INDUSTRY	1ST 3RD 2ND	• END USE NOT REGULATED
DISPOSAL	• CLASSIFY NON-HAZARDOUS • SECONDARY CONTENT	• REGULATIONS TO PROHIBIT	• GOVERNMENT • GOVERNMENT	1ST	• PROHIBIT ROAD OILING, SEWER DISPOSAL,.... • COLLECTION MONITORED • NO DILUTION • SUPPORT BY ENDORSEMENT NOT REGULATIONS

PROPER MANAGEMENT BY GENERATOR - DIY & INDUSTRIAL					
ISSUES	SOLUTION	ACTION REQUIRED	RESPONSIBILITY	TIMING	COMMENT/PRIORITY
REGISTRATION OF INDUSTRIAL USER	• LARGE VOLUME USERS MUST REGISTER	• REG. REGISTRATION SYSTEM	GOVT/CPPI	AFTER CONSULT	
REGULATION OF DO-IT-YOURSELF	• PROHIBIT METHODS OF DISPOSAL	• REGULATION	GOVT	AFTER CONSULT	AT PRESENT, DO NOT RECOMMEND AT THIS TIME REQUIRING DIY'S TO TAKE USED OIL TO APPROVED FACILITY. HOWEVER, REGULATE COLLECTION AND DISPOSAL FACILITIES
EDUCATION			CPPI/GOVT/IND.	NOW	DEV. RETURN REGS AFTER VOLUNTARY MONT SYSTEM HAS BEEN EVALUATED. REGS SHOULD NOT INHIBIT INNOVATION AND BE ENACTED SOLELY FOR COMMERCIAL PURPOSES

WESTERN WORKSHOP - ISSUES AND SOLUTIONS

COLLECTION SYSTEM				
ISSUE	SOLUTION	ACTION REQUIRED	RESPONSIBILITY	TIMING
REGS	<ul style="list-style-type: none"> NATIONAL CLASSIFICATION LOCAL COLLECTION 	<ul style="list-style-type: none"> COLLECTION FACILITY REGULATIONS - PROHIBIT - LICENCE - MANIFEST TDG 	GOVT	1ST
COST	<ul style="list-style-type: none"> MAJOR SELLERS ARE COLLECTORS & INDEPENDENT FROM AGREEMENT 	REVENUE → CENTRAL FUND → COLLECTOR	INDUSTRY	2ND
SYSTEM	<ul style="list-style-type: none"> SMALL COMM.- SINGLE LOCATION LARGE COMM.- SELLER ENSURE COLLECTION IS AVAILABLE 		INDUSTRY & GOVERNMENT	3RD
				TDG: - CLASSIFICATION - MANIFEST FUNDED BY SELLER → COLLECTOR COMPENSATED INDUSTRIAL GENERATORS / SELLERS ENSURE COLLECTION MECHANISM

LIABILITY AND FINANCING				
ISSUES	SOLUTION	ACTION REQUIRED	RESPONSIBILITY	TIMING
LIABILITY	SHARED - GOVERNMENT COLLECTOR / SELLER GOVERNMENT LEADS IN OTHER DISPOSAL OPTIONS	GOVERNMENT REGS AMENDMENT TO ALLOW BURNING AT CEMENT KILNS, ETC.	GOVERNMENTS	
FINANCING	INDUSTRY BEARS COST CO-OP PROGRAM FOR INFO PROMOTION			
				ACCEPTABLE SITES - REGS OWN USED OIL MONITOR/CONTROL STAFF TRAINED HOUSEHOLD HAZARDOUS WASTE DAYS COST OF DOING BUSINESS

PUBLIC AWARENESS				
ISSUES	SOLUTION	ACTION REQUIRED	RESPONSIBILITY	TIMING
GENERIC MESSAGE	COMMUNICATIONS OF CONSISTENT DETAILED INFORMATION	GENERIC LOGO AND PACKAGE	CPPI	
SPECIFIC MESSAGE	COMMUNICATE DETAILS TO SELLERS	DEVELOP AND SEND INFO PACKAGE RE: DETAILS OF PROGRAM	SELLERS	
NATIONAL CONSISTENCY OF INFO PACKAGES	CONSISTENT REGULATIONS	CPPI TO DEVELOP STANDARD REGS	CPPI	
ENDORSEMENT BY PROV. GOV'T		INCLUDE ON CCME AGENDA		ASAP
				MUST INCLUDE READY TO USE INFO & MINIMUM REQUIREMENTS UTILIZE CPPI MATERIAL OR DEVELOP OWN INCORPORATING MINIMUM REQUIREMENTS

ATLANTIC WORKSHOP

ATLANTIC REGION WORKSHOP - ISSUES & SOLUTIONS

ISSUES	SOLUTION	
	DESCRIPTION	COMMENT / PRIORITY
COLLECTION	<ul style="list-style-type: none"> • SELLER IS RESPONSIBLE TO PROVIDE A RETURN SYSTEM • REGIONAL CONSISTENCY • FINANCED THROUGH MARKET FORCES 	<ul style="list-style-type: none"> • AT OWN SITE OR NEARBY OWNED OR CONTRACTED MUNICIPAL DEPOT • NATIONAL OVERTONES
GENERATOR RESPONSIBILITY	<ul style="list-style-type: none"> • MUST RETURN TO AN APPROVED FACILITY • RETURN IN UNCONTAMINATED CONDITION • CONTAMINATION MUST BE DEFINED IN REG. • TOLL FREE NUMBER FOR EDUCATION AND REPORTING VIOLATION 	
END USES	<ul style="list-style-type: none"> • RE-EVALUATE OPTION • ENCOURAGE AS MANY ACCEPT. OPTIONS • EXISTING ACCEPTABLE END USES 	<ul style="list-style-type: none"> • SCIENTIFIC EVALUATION • CEMENT KILNS • RE-REFINERS • INDUSTRIAL BOILERS
LIABILITY	<ul style="list-style-type: none"> • CONTRACTOR RELATIONSHIP BETWEEN COLLECTOR AND FACILITY OPERATOR 	<ul style="list-style-type: none"> • EACH LOAD SAMPLED (GOVT ROLE NOT REQUIRED)
EDUCATION AND PUBLIC AWARENESS	<ul style="list-style-type: none"> • THREE LEVELS: <ul style="list-style-type: none"> - NATIONAL - PROVINCIAL - POINT-OF-SALE 	<ul style="list-style-type: none"> • JOINTLY FEDERAL GOVERNMENT/INDUSTRY • PROVINCIAL GOVERNMENT / INDUSTRY • RETAILER / SUPPLIER
ROLE OF GOVERNMENTS	<ul style="list-style-type: none"> • REGULATION • EDUCATION • CONSULTATION WITH STAKEHOLDERS • QUALITY STANDARDS • AUDIT COMPLIANCE 	<ul style="list-style-type: none"> • END USE OPTION • SELLER RESPONSIBILITY • NON-HAZARDOUS WASTE DESIGNATION • REGIONAL CONSISTENCY

ATLANTIC REGIONAL WORKSHOP - ACTION PLAN

ISSUE	SOLUTION	ACTION REQUIRED	RESPONSIBILITY	TIMING	COMMENT/PRIORITY
• COLLECTION SYSTEM	• SELLER RESPONSIBLE PROVINCIAL RETURN SYSTEM • SYSTEM FULLY OPERATIONAL	• REGULATION	• PROV. GOV'T	• NFLD 91 • NS 92 • PEI 92 • NB 93 • 1-2 YEARS	• CHANGE THE ACT • FUNDED BY MARKET • AFTER REGS. • SOONER WITH VOL. COMPLIANCE
• GENERATOR RESPONSIBILITY	• EDUCATE • RETURN UNCONTAMINATED • STOP (OR AT LEAST REDUCE) IMPROPER DISPOSAL	• USER AWARENESS • USER AWARENESS • REPORT VIOLATIONS	• GOV'T/SUPPLIER • GENERATOR • GENERATOR	• ASAP • NOW • NOW	• TOLL FREE # REG. OFFICE • OVERLAPS WITH EDUCATION/AWARENESS
• END USES	• PROHIBIT UNACCEPTABLE OPTIONS	• REGULATION	• PROV. GOV'T	• NB - 92/93	• NFLD, PEI. & N.S. NOW EXIST
• LIABILITY	NOTE: • NO SPECIAL UNDERWRITING OF LIABILITY REQUIRED • COLLECTOR/SOURCE "CONTRACT" RELATIONSHIP				
• EDUCATION AWARENESS	• PUB. AWARENESS CAMPAIGN	• NATIONAL • PROVINCIAL • POINT-OF-SALE • CONTAINER LABELLING • CONTAINERS & FILTERS	• FED/INDUSTRY • PROV/INDUSTRY • SELLERS/SUPPLIERS • SUPPLIERS • PROV/INDUSTRY	• 91/92 • 92 • 92 • 92 • 92	• SAME AS 1
• ROLE OF GOVERNMENT	• REMOVAL OF HAZARDOUS WASTE DESIGNATION • MAXIMIZE ACCEPT. OPTIONS • HARMONIZE QUALITY STANDARDS • COMPLIANCE MONITORING	• REGULATION • PRIORITY SUBSTANCE LIST ASSESSMENT • REGULATION • REG. AND INTER-PROV. COORDINATION • VOL.IND. COMPLIANCE • GOV'T MONITORING	• PROV. • FED. • PROV. • 4 ATL PROVINCES • INDUSTRY • GOVERNMENT	• 92/93 • 92 • 92 • 92 • NOW • 91/92	• TO MAXIMIZE PRODUCT VALUE • FOLLOW REGULATIONS

QUEBEC WORKSHOP

GOAL

A GLOBAL AND INTEGRATED PLAN, IN ACCORDANCE WITH A POLICY ON SUSTAINABLE DEVELOPMENT

STAKES

- TO SENSITIZE AND ENCOURAGE CONSUMERS
- PICK-UP SYSTEM
- OUTLETS
- MARKET FOR REREFINED OILS
- FINANCING OF PUBLIC EXPENSES
- REGULATORY ISSUES

SENSITIZE AND ENCOURAGE

- LEADERSHIP IN RECYCLING
- WHY IT IS SO IMPORTANT NOT TO THROW AWAY
- NEED TO RETURN OIL AND HOW
- NEED TO BUY THE PRODUCT (REREFINED)
- CONTINUOUS SENSITIZATION
- EXPLAIN LACK OF UNDERSTANDING REGARDING ENERGY ENHANCEMENT MEASURES

PICK-UP SYSTEM

VENDORS' RESPONSIBILITIES (LOCAL OR EASILY ACCESSIBLE FACILITIES)

- RETAIL PERMIT
- STORAGE (SECURE)
- QUALITY CONTROL *

QUEBEC WORKSHOP

OUTLETS

AT LEAST TWO:

- RECYCLING: REREFINING
- ENERGY ENHANCEMENT: CEMENT COMPANIES

WITHIN A SUSTAINABLE DEVELOPMENT FRAMEWORK, PROMOTE REREFINING THROUGH REGULATORY AND FISCAL INCENTIVES

MARKET FOR REREFINED OILS

CREATE DEMAND:

- (A) ENCOURAGE CONSUMERS
- (B) POLICY ON CONTENT
- GOVERNMENT FLEETS
- CAR MANUFACTURERS

FINANCING

1. PARAFISCAL TAX
2. SPECIAL TAX
3. DEPOSIT*
4. GRANTS

QUEBEC ROUND TABLE DISCUSSION ON USED OIL

ATELIER DU QUEBEC

ATELIER DU QUÉBEC

OBJECTIF

UN PLAN GLOBAL ET INTÉGRÉ, GUIDÉ PAR UNE POLITIQUE DE DÉVELOPPEMENT DURABLE.

ENJEUX

- SENSIBILISATION ET INCITATION DES CONSOMMATEURS
- SYSTEME DE COLLECTE
- DÉBOUCHÉS
- MARCHÉ DES HUILES RERAFFINÉES
- FINANCEMENT DES DÉPENSES PUBLIQUES
- ASPECTS RÉGLEMENTAIRES

SENSIBILISATION ET INCITATION

- RÔLE DE LEADERSHIP DE RECYC
- RAISON DE NE PAS JETER
- IL FAUT RAPPORTER ET COMMENT
- IL FAUT ACHETER LE PRODUIT (RERAFFINÉ)
- SENSIBILISATION CONTINUE
- CLARIFIER INCOMPRÉHENSION ENVERS VALORISATION ÉNERGÉTIQUE

SYSTEME DE COLLECTE

RESPONSABILISATION DES VENDEURS (INSTALLATIONS SUR PLACE OU SITUÉS CONVENABLEMENT)

- PERMIS DE DÉTAILLANT
- ENTREPOSAGE (SÉCURITÉ)
- CONTRÔLE DE QUALITÉ *

DÉBOUCHÉE

AU MOINS 2 DÉBOUCHÉS:

- RECYCLAGE: RERAFFINAGE
- VALORISATION ÉNERGÉTIQUE: CIMENTERIES

DANS UN CADRE DE DÉVELOPPEMENT DURABLE, FAVORISER RERAFFINAGE PAR DES INCITATIFS RÉGLEMENTAIRES ET FISCAUX.

MARCHÉ DES HUILES RERAFFINÉE

CRÉER LA DEMANDE:

- (A) PROMOTION AUPRÈS DES CONSOMMATEURS
- (B) POLITIQUE DE CONTENU
 - PARC-AUTOS DES GOUVERNEMENTS
 - MANUFACTURIERS D'AUTOMOBILES

FINANCEMENT

1. TAXE PARAFISCALE
2. TAXE SPÉCIALE
3. CONSIGNE *
4. SUBVENTIONS

TABLE QUÉBÉCOISE DE CONCERTATION SUR LES HUILES USÉES