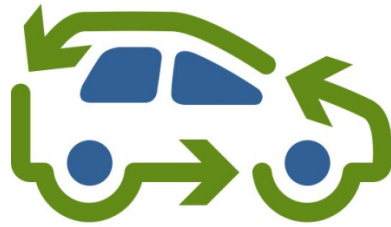


**Industry Stewardship Plan  
Automotive Materials**



**Automotive  
Materials  
Stewardship**

**Industry Stewardship Plan for  
Automotive Materials**

**Prepared and Submitted by**

**Automotive Materials Stewardship**

**Submitted to WDO May 31, 2016**

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# Industry Stewardship Plan Automotive Materials

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## 1. Glossary of Key Terms and Acronyms

The following terms are used in this document. Definitions are those used by Stewardship Ontario, the industry funding organization (IFO) responsible for the Municipal Hazardous or Special Waste (MHSW) Program, unless otherwise noted.

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### Accessibility

The range of options by which Ontarians can divert Automotive Materials, taking into account such factors as the number and location of collection sites including hours of operation.

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### Automotive Materials

The following designated materials:

- Antifreeze, and the containers in which they are contained
- Oil filters – after they have been used for their intended purpose
- Containers that have a capacity of 30 litres or less and that were manufactured and used for the purpose of containing lubricating oil

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### Available for Collection

Estimated quantity potentially available for collection and subsequently available for end-of-life management that is calculated using an available for collection factor against the amount supplied into market in the last full calendar year. Used as the denominator to calculate collection and recycling rates.

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### Collection Rate

Metric to measure the quantity collected compared to what was available for collection. Calculated as a percentage with the numerator representing the quantity of material collected and the denominator representing the quantity available for collection.

$$\text{Collection Rate \%} = \frac{\text{Quantity Collected}}{\text{Quantity Available for Collection}} \times 100$$

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### Collection Target

Projected quantity to be collected on an annual basis expressed as a percentage of the quantity available for collection.

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### Collector

An entity engaged to collect used antifreeze, oil containers and/or oil filters from generators.

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**Consumer**

Synonym for generator (see the definition for generator).

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**Depot**

Facility where generators can drop off used antifreeze, oil containers and/or oil filters, which may have varying hours and periods of operation by season.

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**Diversion**

The management and treatment of materials or products through reuse and/or recycling instead of disposal into landfills or incinerators.

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**Event**

Collection service operated temporarily, typically a portion of one day, at which generators can drop off materials.

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**Generator**

A consumer of antifreeze, oil containers or oil filters that has used antifreeze, oil containers or oil filters available for collection.

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**Industry Funding Organization**

A non-profit, industry-funded organization in Ontario that develops, implements and operates a waste diversion program approved by the Minister of the Environment and Climate Change for wastes designated by the Minister of the Environment and Climate Change.

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**Industry Stewardship Organization**

Any organization (including one steward or a group of stewards) that submits an Industry Stewardship Plan (ISP) to WDO for review.

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**Industry Stewardship Plan**

A Waste Diversion Ontario-approved plan allowing one or more stewards to manage wastes that have been designated under the Waste Diversion Act by the Minister of the Environment and Climate Change.

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**Minister**

The Minister of the Environment and Climate Change for the Province of Ontario.

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**Municipal Hazardous or Special Materials**

Goods and products which are supplied to generators for use in Ontario that result in Municipal Hazardous or Special Waste.

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**Municipal Hazardous or Special Waste**

Waste that consists of municipal hazardous or special waste as defined by the Minister's Program Request Letter and Ontario Regulation 542/06 under the Waste Diversion Act.

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**Municipal Hazardous or Special Waste Program**

The recycling program operated by Stewardship Ontario for the diversion of Automotive Materials and other designated Municipal Hazardous or Special Waste.

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**Ontario Regulation 542/06**

The regulation under the Waste Diversion Act that designates Municipal Hazardous or Special Waste.

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**Processing**

Manual or mechanical alteration of materials for the purpose of recycling.

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**Processor**

An entity that engages in processing of materials for the purpose of recycling.

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**Program Request Letter**

The letter from the Minister to Waste Diversion Ontario dated December 12, 2006 requiring Waste Diversion Ontario to develop a program for certain categories of Municipal Hazardous or Special Waste, including antifreeze, oil containers and oil filters.

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**Recycling**

Any operation by which materials are reprocessed into products, materials or substances, whether for the original or other purposes including the reprocessing of organic material but excluding energy recovery and reprocessing into materials that are to be used as fuels.

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**Recycling Efficiency Rate**

Metric to measure the quantity of material recycled compared to the quantity collected. Calculated as a percentage with the numerator representing the quantity of materials recycled and the denominator representing the total amount of products or packaging materials collected minus reuse.

$$\text{Recycling Efficiency Rate \%} = \frac{\text{Quantity Recycled (material recycling)}}{\text{Quantity Collected - Reuse}} \times 100$$

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**Recycling Rate**

Metric to measure the quantity of material recycled compared to the quantity available for collection. Calculated as a percentage with the numerator representing the quantity of materials recycled and the denominator representing the quantity of products or packaging materials available for collection.

$$\text{Recycling Rate \%} = \frac{\text{Quantity Recycled (material recycling)}}{\text{Quantity Available for Collection}} \times 100$$

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**Recycling Target**

Projected quantity to be recycled on an annual basis expressed as a percentage of what was available for collection (minus reuse, if applicable).

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**Reduction**

Activities by producers and consumers to avoid the generation of waste at source.

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**Reuse**

Provision of a designated waste to another user for its intended purpose.

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**Service Provider**

Entity engaged by Automotive Materials Stewardship inc. to collect, transport, process and/or dispose of automotive materials.

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**Specialty Service Channel**

Collection locations operated by entities other than municipalities and retailers.

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**Steward**

The producers of a designated waste, such as brand owners, first importers and manufacturers, who are required to report to an Industry Funding Organization for a waste diversion program.

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**Stewardship Ontario**

The not-for-profit corporation funded by industry that operates Ontario's Municipal Hazardous or Special Waste and Blue Box Programs.

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**Supplied**

Sold, leased, donated, disposed of, used, transferred the possession or title of or otherwise made available or distributed for use in the Province of Ontario by a generator.

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**Supply Chain**

The system of handling the Automotive Materials returned to the program, including the collection system, transportation and recycling or other approved disposal options.

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**Transporter**

An entity that transports used antifreeze, oil containers and/or oil filters from collectors to processors.

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**Vendor Standard**

Minimum operating standard that a service provider must meet on a continuous basis in order to be registered with Automotive Materials Stewardship inc., and be eligible to provide collection, transportation and/or processing services for automotive materials.

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**Visible Fee<sup>1</sup>**

A fee advertised or displayed in a retail store separate from the shelf price of the product, as a way to recover the rate paid by a member of the ISP to the industry stewardship organization.

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**Waste Diversion Act**

Legislation passed in 2002 that provides for the development, implementation, operation and oversight of waste diversion programs and industry stewardship plans in Ontario.

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**Waste Diversion Ontario**

The non-crown corporation that oversees waste diversion programs and industry stewardship plans under the Waste Diversion Act. Waste Diversion Ontario is responsible for evaluating, approving and overseeing industry stewardship plans.

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<sup>1</sup> This definition was adapted from the ISP for pesticides, solvents and fertilizers submitted by Product Care Association.

The following acronyms are used in this document.

AMS	Automotive Materials Stewardship Inc.
CSA	Canadian Standards Association
CSSA	Canadian Stewardship Services Alliance Inc.
HDPE	High density polyethylene
IC&I	Industrial, commercial & institutional
IFO	Industry funding organization
ISO	Industry stewardship organization
ISP	Industry stewardship plan
LDPE	Low density polyethylene
MHSW	Municipal Hazardous or Special Waste
P&E	Promotion and education
R&D	Research and development
WDA	Waste Diversion Act
WDO	Waste Diversion Ontario
YTD	Year to date

## 2. Introduction

Automotive Materials Stewardship Inc. (AMS) was established to represent the interests of Canadian businesses by creating convenient, environmentally sustainable ways for consumers to recycle waste from the automotive sector.

We are a national, non-profit organization, bringing together key players to achieve better recycling performance. We're industry-led and industry-funded, working on behalf of Canadian businesses that participate in stewardship programs, as well as partnering with provincial stewardship organizations, provincial governments, local governments and waste management companies to provide recycling and waste management services.

We have been asked by stewards of automotive materials to prepare and submit for Waste Diversion Ontario's (WDO) approval an industry stewardship plan (ISP). In accordance with the Waste Diversion Act (WDA) and WDO's Procedures for Industry Stewardship Plans, AMS is submitting this ISP to WDO for the following designated materials:

- Antifreeze, and the containers in which they are contained
- Oil filters – after they have been used for their intended purpose
- Containers that have a capacity of 30 litres or less and that were manufactured and used for the purpose of containing lubricating oil

AMS is submitting this ISP on behalf of the stewards listed in Appendix A. While the ISP is being submitted on behalf of the stewards listed in Appendix A, all obligated stewards supplying the designed materials listed above are welcome to participate in the ISP.



As set out in Section 34 (6) of the WDA, Subsection 31 (1) does not apply to a steward in respect of a designated waste if an ISP for the designated waste is approved and if the steward is participating in the ISP through a contract. Should this ISP be approved, the stewards listed in Appendix A and all other stewards that subsequently execute a contract to participate in the ISP will be exempt from the rules made by Stewardship Ontario, including the requirement to pay the fees for automotive materials set out in the rules.

AMS has proposed to Stewardship Ontario, and Stewardship Ontario has agreed, that AMS will assume responsibility for the entire supply chain for collection and management of used antifreeze, oil containers and oil filters. If any stewards of antifreeze, oil containers or oil filters continue to be registered with Stewardship Ontario after the ISP commences, AMS will provide Stewardship Ontario with access to a proportionate share of the supply at mutually agreeable terms.

AMS is proposing to operate this ISP from the first day of the first month three months following approval for a period of five years.

AMS has considered the following in the preparation of this ISP:

- *Waste Diversion Act, 2002;*
- Ontario Regulation 542/06;
- Ontario Regulation 347, made under the *Environmental Protection Act*; and
- *Transportation of Dangerous Goods Act, 1992.*

### 3. Legislative Background

AMS is submitting this ISP for the designated waste categories of antifreeze, oil containers and oil filters designated by Ontario Regulation 542/06 as Municipal Hazardous or Special Waste (MHSW) pursuant to the Waste Diversion Act, 2002.

Section 34 of the Waste Diversion Act provides that stewards who prefer to take direct responsibility for managing their obligations under the Act may submit an ISP for consideration by WDO.

In 2006, Stewardship Ontario was designated by the Minister of the Environment and Climate Change as the industry funding organization for MHSW. The Phase 1 MHSW Program developed by Stewardship Ontario and approved by the Minister took effect on July 1, 2008.

In 2009, an amended Consolidated MHSW Program Plan was developed by Stewardship Ontario to include Phase 2 and Phase 3 MHSW. Following approval by the Minister, the CMHSW Program took effect on July 1, 2010. In October 2010, the Minister terminated the Program for Phase 2 and Phase 3 MHSW. The CMHSW Program remains the approved Program for Phase 1 MHSW.

## 4. Consultation

During the preparation of this ISP, AMS has met with:

- Stewards supplying antifreeze, oil containers and oil filters, including both producers and retailers;
- Industry associations including the Automotive Industry Association, the Global Automakers Association, and the Retail Council of Canada;
- Collectors of used antifreeze, oil containers and oil filters including municipalities and their associations, such as the Municipal Waste Association;
- Transporters and processors of used antifreeze, oil containers and oil filters and their associations including the Ontario Waste Management Association;
- Stewardship Ontario Board Members and staff, as the industry funding organization currently responsible for managing used antifreeze, oil containers and oil filters.

AMS participated in stakeholder consultations hosted by WDO, including webinars held on April 5 and April 7, 2016.

Stakeholder feedback from all sources was considered when finalizing this ISP.

## 5. Designated Materials

This ISP is for the following waste categories designated under Ontario Regulation 542/06:

- Antifreeze, and the containers in which they are contained
- Oil filters – after they have been used for their intended purpose
- Containers that have a capacity of 30 litres or less and that were manufactured and used for the purpose of containing lubricating oil

The collection services operated by AMS will accept these obligated materials supplied by the stewards that have contracted with AMS and supplied by other stewards to meet the performance targets set out in the ISP.

### **Antifreeze and Containers**

Antifreeze means ethylene or propylene glycol used or intended for use as a vehicle engine coolant. Waste antifreeze is collected from residential and all industrial, commercial and institutional (IC&I) generators.

Antifreeze is supplied in concentrate form that is diluted with water to desired concentration by the user. Antifreeze is also supplied premixed with water.

Waste antifreeze includes antifreeze that was originally supplied in both bulk and packaged formats. Packaged antifreeze can be purchased from retailers, service stations, gas stations, automotive shops, dealerships, etc. The dominant package size is a 3.78L format, but antifreeze is also supplied in 1L, 1.89L, 9.46L and 18.9L containers. Containers are commonly made of high density

polyethylene (HDPE) plastic. Bulk antifreeze is supplied to businesses servicing vehicles in containers greater than 30 litres such as tanker trucks or drums.

Antifreeze is installed and replaced in vehicles either by the vehicle owner (referred to as do-it-yourself) or, more commonly, by an automobile service business (referred to as do-it-for-me)<sup>2</sup>.

AMS supports waste reduction by encouraging generators to buy only the amount of antifreeze they need and to use up all that they purchase. Waste antifreeze delivered to collection sites is transported to a processing location to recover glycol. Current technologies being used include distillation and reverse osmosis.

AMS will investigate opportunities to quantify any amount of antifreeze being directed to reuse applications as such practice would reduce the quantity available for collection.

The containers in which antifreeze is contained are considered to be:

- Containers used by residential and IC&I generators to deliver used antifreeze to collection sites; and
- Containers emptied of antifreeze by automobile service businesses in their role as a do-it-for-me service provider.

It is assumed that some residents will continue to manage empty antifreeze containers through the Blue Box system where accepted by municipalities, as has been their pattern for many years<sup>3</sup>. Containers used to deliver antifreeze to ISP collection sites and containers emptied of antifreeze by automobile service businesses in their role as an ISP do-it-for-me service provider will be managed under the ISP<sup>4</sup>.

As antifreeze is altered during use through dilution and loss, a factor of 68%<sup>5</sup> is used to calculate the antifreeze and containers that are available for collection. The containers used to deliver antifreeze to collection sites and containers emptied of antifreeze by automobile service businesses in their role as a do-it-for-me service provider are included in the quantity available for collection expressed as tonnes using this factor.

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<sup>2</sup> Automobile owners who service their own vehicles are 'do-it-yourself' vehicle owners. Automobile owners who take their vehicles to companies that provide vehicle maintenance services are 'do-it-for-me' vehicle owners.

<sup>3</sup> The net Blue Box system cost, 50% of which is the responsibility of Blue Box stewards, includes the cost to manage any empty antifreeze containers placed by residents into the Blue Box system. The cost to manage the empty antifreeze containers through the Blue Box system is allocated across antifreeze containers supplied to the marketplace as reported by Blue Box stewards.

<sup>4</sup> The cost to manage antifreeze containers delivered to ISP collection sites is incorporated in the rates paid by stewards that are part of the ISP.

<sup>5</sup> This factor is subject to continuous improvement of the following assumptions using best available data:

- Glycol has a weight of 1.15 kg per litre
- A 3.78 litre antifreeze container weighs 0.14 kilograms
- 84.4% of antifreeze is supplied as packaged and 15.6% is supplied as bulk
- 50% of antifreeze supplied as packaged is premixed and 50% is concentrated
- 70% of antifreeze supplied as bulk is premixed and 30% is concentrated
- 53% of packaged antifreeze is lost during service or use
- 70% of bulk antifreeze is lost during service or use

## Oil Containers

Oil containers are containers that have a capacity of 30 litres or less and that were manufactured and used for the purpose of containing lubricating oil. Waste oil containers are collected from residential and all IC&I generators.

Containers manufactured and used for the purpose of containing lubricating oil are primarily manufactured from HDPE plastic. Oil containers containing lubricating oil are emptied by the vehicle owner (do-it-yourself) or, more commonly, by an automobile service provider (do-it-for-me). Waste oil container sizes are typically 500 ml, 946 ml, 1L, 3.78L, 4L, 4.4L, 4.73L 5L, 10L, 18.9L, and 20L.

Plastic from waste oil containers delivered to a collection site is recycled into new products.

As some oil containers are repurposed, a factor of 93%<sup>6</sup> is used to calculate the oil containers available for collection. The containers delivered to collection sites and containers emptied of oil by automobile service businesses in their role as a do-if-for-me service provider are included in the quantity available for collection expressed as tonnes using this factor.

## Oil Filters

Oil filters are filters produced and/or arriving into the province, and which are for sale, directly or as part of a product, in Ontario. Waste oil filters are collected from residential and all IC&I generators.

Oil filters are used in automotive engines and other equipment for the purpose of filtering contaminants from fluids. Oil filters are installed and replaced in vehicles either by the vehicle owner (do-it-yourself) or, more commonly, by an automobile service business (do-it-for-me).

Used oil filters delivered to collection sites are transported to processors where the steel and oil are captured and recycled.

As oil filters contain residual oil when disposed, a factor of 154%<sup>7</sup> is used to calculate the oil filters available for collection.

## 6. Program Design

### 6.1. Reduction

The quantity of used antifreeze requiring management is reduced through decreased leakage during use and extended service intervals.

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<sup>6</sup> This factor is subject to continuous improvement of the following assumptions using best available data:

- 34% of oil containers (by weight) are 20 litre pails
- 20% of the 20 litre pails are repurposed by the agricultural sector and are not available for collection

<sup>7</sup> This factor is subject to continuous improvement of the following assumption using best available data:

- A used oil filter weighs an average of 54% more than the weight of a new oil filter

The number of oil containers requiring management is reduced through extended service intervals and a gradual increase in bulk dispensing as the number of do-it-yourself oil changes declines.

The number of oil filters requiring management is reduced through extended service intervals.

The proliferation of electric vehicles will further reduce the number of oil containers and oil filters supplied.

## **6.2. Reuse**

Some oil containers, predominately the larger containers, are reused.

## **6.3. Collection and Recycling**

Management of used antifreeze, oil containers and oil filters involves three categories of service, and the entities performing the service are referred to as service providers. The categories of service are:

- Collection,
- Transportation, and
- Processing

AMS will adopt the service provider vendor standards currently being used by Stewardship Ontario. Service providers will be required to meet and conform to these vendor standards in order to be eligible to manage used antifreeze, oil containers and oil filters under the ISP.

AMS will also adopt registrations of service providers currently in place with Stewardship Ontario. AMS intends to continue to use the same registration and qualification process for any additional service providers for a period of one year. For future service provider procurement, AMS will ensure that a fair and transparent process is employed that allows an equitable opportunity to participate.

The vendor standards and the registration and qualification process may be revised and updated from time to time, following consultation with affected stakeholders, to reflect ongoing dialogue with service providers, changes to market conditions, legal and regulatory requirements, business needs, and best practices. In modifying the existing vendor standards and the registration and qualification process, AMS will, to the extent reasonably possible, seek to:

- Provide predictability;
- Foster openness and transparency;
- Make decisions without bias or prejudice;
- Adhere to the principles of continuous improvement; and
- Provide equitable opportunities to compete.

AMS is dedicated to continuous improvement of its supply chain. Regular reviews of existing programs, processes and payment rates are undertaken to ensure cost effective program delivery and the achievement of collection and recycling targets. As a result, the actual methods, tactics and

programs by which AMS will undertake its material management activities may change over time as market conditions evolve.

AMS supports a marketplace that maintains and encourages competition, achieves efficiencies and cost-effectiveness and ensures that all service providers have a fair and equitable opportunity to participate in the provision of services. Without limiting the foregoing, vendor selection and supply chain management strategy will be implemented in accordance with these principles and with transparency to the extent possible while protecting commercially sensitive information. AMS will, to the extent reasonably possible, promote multiple service provider alternatives to mitigate service disruption risk.

#### 6.4. Accessibility

AMS's guiding principles for operating a collection system are as follows:

- AMS will continuously seek to improve accessibility across the province through the development and refinement of its network of collection sites, taking into consideration the need for accessibility in remote and sparsely populated areas (e.g. Northern Ontario) as well as medium and large urban centres.
- Generators are able to deliver used antifreeze, oil containers and oil filters to a collection site at no charge to the generator.
- Collection sites will be both effective and efficient within their geographic and/or demographic context.
- The network of collection sites will have sufficient capacity to collect more than the annual collection target in tonnes for each material.

Table 6.1 sets out the number of locations providing collection services (as of December 2015) representing the supply chain currently under contract to Stewardship Ontario that will be assumed by AMS. Collection depots and events and return-to-retail locations accept used antifreeze, oil containers and oil filters from households. Speciality service channels manage used antifreeze, oil containers and oil filters from IC&I generators.

**Table 6.1 – Collection Services**

<b>Material Category</b>	<b>Collection Depots<sup>8</sup></b>	<b>Collection Events</b>	<b>Return to Retail<sup>9</sup></b>	<b>Specialty Service Channel</b>
Antifreeze	88	323	756	12,000
Oil Containers	88	323	756	12,000
Oil Filters	88	323	816	12,000

<sup>8</sup> Includes 2 toxic taxis. Over 85% of Ontarians have access to these 88 collection depots.

<sup>9</sup> Refers to the number of automobile service centers that accept waste auto related products from residents. These locations are also included in the 12,000 locations under the Specialty Service Channel.

AMS will regularly review the performance of its collection network to identify best practices, growth opportunities, and ineffective or inefficient collection sites. Resources are allocated to establishing new collection sites where growth opportunities are identified. Such growth opportunities may include, but are not limited to:

- Geographic regions with disproportionately low numbers of collection sites for used antifreeze, oil containers and oil filters; and
- High performing areas where current collection sites are nearing capacity.

A collection site that is identified as being ineffective and/or inefficient within its geographic and/or demographic context may be closed to free up resources for new and/or existing collection sites.

AMS has set a goal of increasing its collection system by 25 collection locations or events per year.

### **6.5. Communications, Promotion and Education**

Consumer research undertaken in late 2010<sup>10</sup> identified that 95% of respondents claimed awareness of some or all of the items that constitute municipal hazardous or special waste. The research identified a number of common themes:

- What is household hazardous waste? – Tell me what it is...
- How do I dispose of it safely? Where do I take it? – Tell me what to do with it...
- What happens to it? Doesn't it all go to landfill anyway? – Tell me why I can trust you...

A vast majority (93%) felt that proper disposal of toxic waste is important to them and their families. For six in ten respondents (61%), it was unacceptable to have hazardous waste discarded into landfills. The potential for engagement of Ontario residents appears very high (total likely at 94% including very likely at 75%) provided that all elements are in place: education/awareness, convenient temporary storage container, convenient drop off areas, easy identification of hazardous products, and a connection with existing disposal opportunities.

The potential for engagement of Ontario residents in proper hazardous waste management appears very high provided that all elements are in place: education/awareness, easy identification of hazardous products, convenient drop off locations and connecting consumers to existing diversion opportunities.

AMS's promotion and education strategy aims to reach generators of used antifreeze, oil containers and oil filters to change behavior in order to maintain and grow collection against targets for the materials. Communication activities will focus on increasing awareness, driving behaviour change and supporting collectors through the following elements:

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<sup>10</sup> Qualitative and quantitative research was conducted by Pollara and was representative of the general population of Ontario.

## **Education**

- Partner with collectors to promote their activities (e.g. municipal communications)
- P&E tool kit that includes collateral designed to improve communications and support collection of used antifreeze, oil containers and oil filters

## **Awareness**

- Transfer the relevant information from Stewardship Ontario's website to AMS's website to provide information on collection locations for used antifreeze, oil containers and oil filters or contract with Stewardship Ontario to include such information on their Orange Drop website
- Request a direct link from Stewardship Ontario's website to the automotive materials pages on AMS's website to seamlessly redirect consumers seeking information
- Provide interactive and/or online resource materials for waste generators and service providers to foster education and learning in support of collection targets
- Utilize opportunities to work co-operatively with Stewardship Ontario, Ontario Electronic Stewardship, Ontario Tire Stewardship, Product Care Association and other waste diversion programs to efficiently reach residents and businesses as waste generators

## **Behaviour change**

- Increase consumer awareness by employing tactics such as awareness campaigns, the use of social media platforms and consumer facing events to reach many audiences and multiple demographics of waste generators

In support of this general communications strategy, the following will be utilized where appropriate:

- Point of sale materials;
- Awareness campaigns;
- Social media;
- Branded displays;
- Promotional incentives such as coupons; and
- Media buys.

As AMS will continue to contract the locations currently providing collection services for used antifreeze, oil containers and oil filters and as AMS will work co-operatively with Stewardship Ontario to manage the transition of these commercial agreements, residential and IC&I generators should not encounter any transition issues when AMS's ISP for used antifreeze, oil containers and oil filters commences.

## **6.6. Research and Development**

Research and development (R&D) activities will be implemented as required to address barriers where materials are underperforming in terms of collection and/or recycling targets.



R&D investments will be:

- Linked to targets for each material and to the progress required to meet those targets;
- Funded by the material(s) benefitting by the activities with no cross-subsidization;
- Available to the market through a transparent and equitable process, examples of which include, but are not limited to, requests for expressions of interest and/or requests for proposals; and
- Implemented through partnerships, wherever possible, with other organizations, such as private sector service providers, municipalities and government agencies.

The need for material specific R&D will be considered during development of each annual operations plan.

### **6.7. Financial and Human Resources**

AMS is a federally incorporated not-for-profit organization whose mandate is to achieve sustainable producer responsibility, greater administrative efficiencies and less complexity for stewards of automotive materials. AMS will contract with Canadian Stewardship Services Alliance Inc. (CSSA) for program administration and operations. CSSA provides administrative services to five producer responsibility organizations, including AMS, Stewardship Ontario, Multi-Material British Columbia, Multi-Material Stewardship Western and Multi-Material Stewardship Manitoba.

CSSA's human resources, including those currently providing administrative services to Stewardship Ontario in support of the MHSW Program, will be available to administer and manage the activities described in this ISP. Administrative services provided by CSSA include but are not limited to steward reporting, service provider reporting, financial services, communications, supply chain design and field services. An experienced team will manage the operations of the program under the terms of a management services agreement with AMS to ensure the ISP's performance targets are achieved and vendor standards are adhered to.

Additional subcontractors may be used to deliver some services (e.g. to liaise with collectors, transporters and processors to manage used antifreeze, oil containers and oil filters, similar to the approach utilized by Stewardship Ontario).

AMS's costs to administer and manage the activities described in this ISP, whether delivered directly or via subcontractors, will be recovered from the stewards of antifreeze, oil containers and oil filters that have contracted with AMS to participate in this ISP.

### **6.8. Program Cost Elements and Fee Setting Methodology**

AMS will incur the following costs to deliver this ISP:

- Costs associated with developing this ISP;
- Costs for implementation and transition;
- Costs to administer and support stewards participating in the ISP;
- Overhead costs;

- Promotion and education costs;
- Service provider and material management costs; and
- Costs levied by WDO.

Program expenses will be financed by stewards participating in the ISP. Rates for each material will be calculated based on the quantity of antifreeze, oil containers and oil filters supplied into the marketplace and the budgeted expenses. AMS’s guiding principles for allocating costs among ISP participants are as follows:

- Costs will be allocated among ISP participants in a fair manner.
- Costs will be allocated based on data reported by all ISP participants subject to quality control processes.

Rates for ISP participants are calculated using the following data sources:

- Reports received from ISP participants;
- Contracts and agreements between AMS and service providers for the management of used antifreeze, oil containers and oil filters;
- Contracts for P&E and R&D to meet collection and recycling targets;
- Composition audits, cost allocation studies and other analyses to identify material management cost drivers utilized in cost allocation methodologies; and
- AMS’s associated overhead costs.

Rates will be subject to adjustment from time to time as needed, with a notice period of at least 90 days.

ISP participants will not levy visible fees.

## 7. Program Performance

### 7.1. Collection Targets

Table 7.1 sets out collection targets for used antifreeze, oil containers and oil filters expressed as a percentage of the quantity of each material available for collection. Also included in Table 7.1 is the MHSW Program Target for Year 5, for comparison.

**Table 7.1 – Collection Targets (Expressed as % of Available for Collection)**

<b>Material Category</b>	<b>MHSW Program Year 5 Target</b>	<b>Year 1 2016</b>	<b>Year 2 2017</b>	<b>Year 3 2018</b>	<b>Year 4 2019</b>	<b>Year 5 2020</b>
Antifreeze	50%	50%	51%	52%	53%	54%
Oil Containers	52%	52%	57%	62%	67%	72%
Oil Filters	85%	85%	86%	87%	88%	89%

AMS will seek to maintain Stewardship Ontario’s reported performance for 2015, discounted for any contamination by non-Automotive Materials commingled with Automotive Materials, where such performance exceeds the targets in Table 7.1.

AMS will undertake research to understand the factors contributing to the performance of automotive materials, including whether the assumptions used to determine the quantity available for collection are correct.

AMS intends to assume a collection network that represents virtually all locations managing automotive materials in Ontario. As a result of this market saturation, growth in collection performance is expected to be modest.

Collection targets expressed as tonnes are calculated by multiplying the collection target percentage by the tonnes of used antifreeze, oil containers and oil filters available for collection, respectively.

$$\text{Collection target as tonnes} = \frac{\text{Collection Target (Tonnes)}}{\text{Collection target as percentage}} \times \text{Tonnes available for collection}$$

The collection performance rate expressed as a percentage is calculated as follows:

$$\text{Collection Rate (Percentage)} = \frac{\text{Quantity Collected}}{\text{Quantity Available for Collection}} \times 100$$

## 7.2. Recycling Efficiency Rates

In order to achieve the recycling targets set out in Table 7.3, associated recycling efficiency rates must be achieved during material processing. The recycling efficiency rates are based on:

- Distilling the used antifreeze that is collected to recover glycol for use in heat transfer, de-icing or dehumidifying applications;
- Directing the used antifreeze containers that are collected to plastic recycling markets;
- Directing the used oil containers that are collected to plastic recycling markets; and
- Directing the used oil filters that are collected to steel recycling markets.

The following table sets out the projected recycling efficiency rates.

**Table 7.2 – Projected Recycling Efficiency Rates (Percentages)**

Material Category	Percentage Rate
Antifreeze	100%
Oil Containers	100%
Oil Filters	100%

The recycling efficiency rate expressed as a percentage is calculated as follows:

**Recycling Efficiency Rate (Percentage)**

$$\text{Recycling Efficiency Rate \%} = \frac{\text{Quantity Recycled}}{\text{Quantity Collected}} \times 100$$

**7.3. Recycling Targets**

The recycling target expressed as a percentage is calculated as follows:

**Recycling Target (Percentage)**

$$\text{Recycling target as percentage} = \text{Recycling efficiency rate} \times \text{Collection target as percentage}$$

The following table sets out recycling targets expressed as percentages calculated by multiplying the percentages in Tables 7.1 and 7.2. These recycling targets will be recalculated in the event that the projected Recycling Efficiency Rates in Table 6.2 are determined to be inaccurate.

**Table 7.3 – Recycling Targets (Percentages)**

<b>Material Category</b>	<b>MHSW Program Year 5 Target</b>	<b>Year 1 2016</b>	<b>Year 2 2017</b>	<b>Year 3 2018</b>	<b>Year 4 2019</b>	<b>Year 5 2020</b>
Antifreeze	50%	50%	51%	52%	53%	54%
Oil Containers	52%	52%	57%	62%	67%	72%
Oil Filters	85%	85%	86%	87%	88%	89%

Recycling targets expressed as tonnes are calculated by multiplying the recycling target percentage by the tonnes of used antifreeze, oil containers and oil filters available for collection, respectively.

**Recycling Target (Tonnes)**

$$\text{Recycling target as tonnes} = \text{Recycling target as percentage} \times \text{Available for Collection as tonnes}$$

The recycling rate expressed as a percentage is calculated as follows:

**Recycling Rate (Percentage)**

$$\text{Recycling Rate as \%} = \frac{\text{Quantity Recycled}}{\text{Quantity Available for Collection}} \times 100$$

## 8. Performance Measurement and Reporting System

AMS's performance measurement framework is designed to report on the key outcomes required to meet its collection and recycling targets in an economically-sustainable manner while:

- Maximizing efficiency of collection and recycling programs;
- Nurturing a fair and competitive marketplace;
- Achieving full compliance with applicable legislation; and
- Earning and maintaining the trust and confidence of stakeholders.

As required, AMS will submit an annual business performance plan to WDO in advance of each calendar operating year.

AMS will adopt Stewardship Ontario's Instructions for Weighing Municipal Hazardous or Special Waste, dated July 10, 2012 to ensure consistency in data tracking.

According to the Plan Agreement with WDO, AMS will report on a regular basis to WDO with regard to the operation and performance of the ISP, including but not limited to quarterly performance reports against collection and recycling targets.

In addition to quarterly reports to WDO, AMS will submit an annual report to WDO for each calendar year, on behalf of the participating stewards, in accordance with the *Waste Diversion Act* and the Plan Agreement between WDO and AMS. The annual report will include audited financial statements and a statement of accuracy and completeness of non-financial data. The scope of work for the non-financial data audit will be set out in an audit plan, developed in co-ordination with an independent third-party auditor. AMS will post the annual report on its website.

## 9. Transition

### 9.1. Program Operations

AMS will establish with Stewardship Ontario a mutually satisfactory financial transition that will result in the repayment to Stewardship Ontario of:

- Wind down costs to be incurred by Stewardship Ontario associated with departing stewards; and
- Any other mutually agreed transition costs.

AMS is proposing to assume responsibility for Stewardship Ontario's entire supply chain for collection and management of used antifreeze, oil containers and oil filters, including the locations currently providing collection services for used antifreeze, oil containers and oil filters. Therefore, there is no need to redirect residential and IC&I generators of used antifreeze, oil containers and oil filters, generators should not encounter any transition issues and no used antifreeze, oil containers and oil filters will be managed by Stewardship Ontario's supply chain.

AMS will adopt the service provider vendor standards currently being used by Stewardship Ontario and the registrations of service providers currently in place with Stewardship Ontario. The commercial terms with service providers will be maintained for at least one year following the commencement of the ISP to minimize disruption during the transition process.

## **9.2. Steward Transfer**

AMS and Stewardship Ontario are co-operating to inform stewards of antifreeze, oil containers and oil filters currently registered with Stewardship Ontario, using electronic communications and direct contact, about the development and submission of this ISP and the opportunity to participate in the ISP.

ISP participants are required to pay their final period MHSW fees calculated on the basis of each steward's share of Stewardship Ontario's quarterly costs, pursuant to the provisions of Regulation 542/06 as amended by Ontario Regulation 11/12, subject to any subsequent reconciliation charges. According to Section 3.3 of Stewardship Ontario's 2015 Rules for Stewards, a steward intending to join an ISP must be in good standing and remains obligated to pay its share of Stewardship Ontario's costs with respect to the period ending on the ISP's effective date.

The following procedures will be followed by stewards to transfer from the MHSW Program operated by Stewardship Ontario to this ISP operated by AMS:

- During development of the ISP
  - A steward registers with AMS and agrees to AMS's Membership Agreement;
  - The steward confirms that it is in compliance with Stewardship Ontario's Rules for Stewards, has met all of its obligations to Stewardship Ontario under the Rules and intends to continue to meet its obligations up until the date of the ISP commencement;
- At commencement of the ISP
  - The steward confirms that it has met all of its obligations to Stewardship Ontario under the Rules as of the effective date of AMS's ISP; and
- After commencement of the ISP
  - The steward confirms that it has met all of its obligations to Stewardship Ontario under the Rules as of the date the steward joins AMS's ISP.

If any stewards of antifreeze, oil containers or oil filters continue to be registered with Stewardship Ontario after the ISP commences, AMS will contract with Stewardship Ontario for proportional use of the supply chain at a proportionate cost.

## **10. Roles and Responsibilities**

AMS will adhere to the requirements of the ISP Agreement between WDO and AMS.

Should a claim that AMS is affecting the marketplace in an unfair manner be substantiated, AMS will immediately take steps to correct its actions and/or procedures to address the identified inequity. Until such a claim has been made and substantiated, it is not possible to predict specific actions.

The following stakeholder engagement principles will be applied to any future consultation:

- Identify those affected by, and with an interest in, the ISP and understand their personal and commercial relationship to the ISP;
- Engage these stakeholders early and often;
- Communicate clearly with stakeholders about the ISP's objectives and the topics that are the subject of the consultation;
- Listen carefully to the views of stakeholders and identify how these views align or conflict with the ISP's objectives; and
- Wherever possible, seek solutions that are neutral or beneficial to stakeholders.

## 11. Appendices

### A. List of Stewards that Intend to Join the ISP

As of the submission date to WDO, the following stewards have submitted letters of intent to join the ISP.

<b>Company Name</b>	<b>Antifreeze</b>	<b>Oil Containers</b>	<b>Oil Filters</b>
Affinia Canada			Y
Chevron Canada Limited	Y	Y	
John Deere Canada	Y	Y	Y
Petro-Canada Lubricants Inc.	Y	Y	
Recochem	Y		
Shell Canada Products	Y	Y	Y
Valvoline Canada	Y	Y	Y
Wakefield Canada		Y	
Walmart Canada	Y	Y	Y

No stewards have signed Membership Agreements as of the submission date to WDO.

A template letter of intent will be temporarily available at [www.automotivematerialsstewardship.ca](http://www.automotivematerialsstewardship.ca).



**B. Automotive Materials Inclusions and Exclusions**

<b>Antifreeze</b>						
Means ethylene or propylene glycol used or intended for use as a vehicle engine coolant.						
<b>Notes</b>	<b>Sector(s) into which MHSM is Supplied</b>	<b>Examples</b>	<b>Exclusions</b>	<b>Reporting Category</b>	<b>Unit of Measure</b>	<b>Fee Category</b>
<ul style="list-style-type: none"> <li>Containers of packaged antifreeze are included if they have a volume equal to or less than 30 litres</li> </ul>	<ul style="list-style-type: none"> <li>Residential</li> <li>All IC&amp;I Businesses</li> </ul>	<ul style="list-style-type: none"> <li>Includes premixed (water diluted) and concentrated product</li> <li>Antifreeze Supplied in all container sizes including Bulk and Packaged                             <ul style="list-style-type: none"> <li>Bulk is Supplied in containers greater than 30 litres (e.g. delivered using a tanker trailer)</li> <li>Packaged is Supplied in containers equal to or less than 30 litres</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Factory fill initial charge of vehicle antifreeze</li> <li>Plumbing antifreeze</li> <li>Vehicle windshield antifreeze</li> <li>Product marketed as industrial heat transfer fluid</li> <li>Fuel (gasoline &amp; diesel) antifreeze</li> <li>Lock de-icer</li> <li>Air brake antifreeze</li> <li>Antifreeze which does not contain ethylene or propylene glycol</li> </ul>	Packaged	Volume in litres	Antifreeze
				Bulk	Volume in litres	Antifreeze

## Oil Containers

Containers that have a capacity of 30 litres or less and that were manufactured and used for the purpose of containing lubricating oil.

Notes	Sector(s) into which MHSM is Supplied	Examples	Exclusions	Reporting Category	Unit of Measure	Fee Category
<p>For this purpose, “lubricating oil” means petroleum-derived or synthetic crankcase oil, engine oil, hydraulic fluid, transmission fluid, gear oil, heat transfer fluid, or other oil or fluid used for lubricating machinery or equipment and includes:</p> <ul style="list-style-type: none"> <li>• Any crankcase or engine oil</li> <li>• Hydraulic fluid</li> <li>• Polyol ester fluids</li> <li>• Circulating oil or turbine oil</li> <li>• Paper machine oil</li> <li>• Transmission fluid</li> <li>• Power steering fluid</li> <li>• Gear oil</li> <li>• Vegetable oil for lubrication</li> <li>• Re-refined oil</li> <li>• Electrical insulating oil</li> <li>• Refrigeration system oil</li> <li>• Compressor oil</li> <li>• Mineral heat transfer fluid</li> <li>• Marine engine oil for vessels operating domestically</li> <li>• Metal working oil</li> <li>• Form release oil</li> <li>• Textile oil</li> <li>• Chain oil</li> <li>• Rock drill oil</li> <li>• 2-cycle engine oil</li> <li>• Gasoline / 2-cycle engine oil mixes</li> <li>• Saw guide oil</li> <li>• Drawing, stamping and shaping oil</li> <li>• Process oil</li> <li>• Dedusting oil</li> </ul>	<ul style="list-style-type: none"> <li>• Residential</li> <li>• All IC&amp;I Businesses</li> </ul>	<ul style="list-style-type: none"> <li>• Containers that contained Lubricating Oil</li> </ul>	<p>Containers that contained</p> <ul style="list-style-type: none"> <li>• Ethylene glycol heat transfer fluid</li> <li>• Propylene glycol heat transfer fluid</li> <li>• Silicone heat transfer fluid</li> <li>• Synthetic aromatic hydrocarbon heat transfer fluid</li> <li>• Glycol-based heat transfer fluid</li> <li>• Water glycol hydraulic fluid</li> <li>• Phosphate ester hydraulic fluid</li> <li>• Hydraulic oil dye</li> <li>• Polyglycol synthetic compressor oil</li> <li>• Base oil, including re-refined base oil</li> <li>• Grease</li> <li>• Oil additive</li> <li>• Oil treatment</li> <li>• Diesel fuel treatment</li> <li>• Cleaning/flushing fluids for motors/equipment</li> <li>• Winter start fluid</li> <li>• Brake fluid</li> <li>• Undercoating</li> <li>• Penetrating oil</li> <li>• Hydraulic jack oil</li> <li>• 3-in-1 household oil</li> <li>• Aerosol propelled lubricant</li> <li>• Gun oil</li> <li>• Kerosene</li> <li>• Urethane coating</li> <li>• Sewing machine oil</li> <li>• Cooking oil</li> <li>• Windshield washer fluid</li> </ul>	Oil Containers	Volume in litres	Oil Containers

<ul style="list-style-type: none"><li>• Marine cylinder oil</li><li>• Machine tool and slideway lubricant</li><li>• Natural gas compressor oil</li><li>• Conveyor lube</li><li>• Dripless lube</li><li>• Quenching oil</li><li>• Pneumatic system oil</li><li>• Rustproof oil</li><li>• Food grade white mineral oil</li></ul>						
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<b>Oil Filters</b>						
Means filters produced and/or arriving into the province, and which are for sale, directly or as part of a product, in Ontario.						
<b>Notes</b>	<b>Sector(s) into which MHSM is Supplied</b>	<b>Examples</b>	<b>Exclusions</b>	<b>Reporting Category</b>	<b>Unit of Measure</b>	<b>Fee Category</b>
• None	• Residential • All IC&I Businesses	<ul style="list-style-type: none"> <li>• Spin-on or element style filters that are used in hydraulic, transmission or internal combustion engine applications</li> <li>• Diesel fuel filters</li> <li>• Household furnace fuel filters</li> <li>• Coolant filters</li> <li>• Storage tank diesel fuel filters</li> <li>• Plastic &amp; paper element style filters</li> <li>• Diesel fuel filters used at retail and commercial pump islands</li> <li>• Sump type automatic transmission filter</li> </ul>	<ul style="list-style-type: none"> <li>• Gasoline fuel filters</li> <li>• Air filters</li> <li>• Household furnace air filters</li> <li>• Sock-type filters</li> </ul>	Less than or equal to 8"	Number of units Supplied	Oil Filters
				Greater than 8"	Number of units Supplied	Oil Filters

### C. Affected Stakeholders and Proposed Consultation Process

Affected stakeholders include:

- Stewards of antifreeze, oil containers and oil filters registered with Stewardship Ontario;
- Stewards of antifreeze, oil containers and oil filters who are non-compliant;
- Service providers operating the collection locations set out in Table 6.1 for used antifreeze, oil containers and oil filters under contract to Stewardship Ontario;
- Service providers providing transport and processing of used antifreeze, oil containers and oil filters under contract to Stewardship Ontario;
- Other organizations and companies not currently under contract to Stewardship Ontario that have an interest in providing collection, transport and/or processing of used antifreeze, oil containers and oil filters;
- End markets for used antifreeze, oil containers and oil filters;
- Environmental non-government organizations with an interest in waste diversion; and
- Stewardship Ontario, as the industry funding organization currently responsible for the collection and management of used antifreeze, oil containers and oil filters.

AMS is in regular discussions with Stewardship Ontario regarding this ISP and the transition of services.

AMS is also in regular discussions with the ISP participants listed in Appendix A regarding this ISP. AMS will work with Stewardship Ontario to distribute a notice to all stewards registered with Stewardship Ontario who supply antifreeze, oil containers and oil filters to notify them of this ISP, provide a summary of the key ISP elements and provide an opportunity for one-on-one discussions with any who have an interest in the ISP.

Recognizing that WDO is obligated to consult with stakeholders and in an effort to respect stakeholders' available time, AMS has worked co-operatively with WDO to consult with the following stakeholders:

- Service providers operating the collection locations set out in Table 6.1 for used antifreeze, oil containers and oil filters under contract to Stewardship Ontario;
- Service providers providing transport and processing of used antifreeze, oil containers and oil filters under contract to Stewardship Ontario;
- Other organizations and companies not currently under contract to Stewardship Ontario that have an interest in providing collection, transport and/or processing of used antifreeze, oil containers and oil filters;
- End markets for used antifreeze, oil containers and oil filters; and
- Environmental non-government organizations with an interest in waste diversion.

## D. List of Key Program Stakeholders

ISP stakeholders include:

- Stewards listed in Appendix A;
- Stewards not listed in Appendix A who subsequently choose to join the ISP;
- Service providers operating the collection locations set out in Table 6.1 for used antifreeze, oil containers and oil filters currently under contract to Stewardship Ontario; and
- Service providers providing transport<sup>11</sup> and processing<sup>12</sup> of used antifreeze, oil containers and oil filters currently under contract to Stewardship Ontario; and
- End markets for used antifreeze, oil containers and oil filters.

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<sup>11</sup> A list of approved transporters is posted on the Stewardship Ontario website. This list includes 47 companies approved to transport used antifreeze, oil containers and/or oil filters as of January 2016.

<sup>12</sup> A list of approved processors is posted on the Stewardship Ontario website. This list includes 8 processors approved to manage used antifreeze, 11 processors approved to manage used antifreeze and oil containers and 14 processors approved to manage used oil filters as of January 2016.

## E. Description of Operations

Collection sites will be registered with AMS if they are large commercial or retail operations, or operated by a municipality. Smaller, privately-owned commercial sites (e.g., service stations and garages) are not required to register in advance of collecting used antifreeze, oil containers or oil filters. Collection sites are responsible for establishing contracts or agreements with approved transporters.

Municipalities operating collection sites for used antifreeze, oil containers and oil filters will be remunerated for doing so, as set out in the agreements with Stewardship Ontario that will be adopted by AMS. No payment is provided to commercial and retail collection sites for collection of used antifreeze, oil containers or oil filters.

AMS will adopt Stewardship Ontario's Collection Site Standards, dated October 1, 2012, as posted on Stewardship Ontario's website.

Transporters transport used antifreeze, oil containers or oil filters from collection sites to an approved processor. AMS will provide the financial incentives established by Stewardship Ontario to transporters of used antifreeze, oil containers and oil filters<sup>13</sup>. Transporters must be registered with AMS in order to be eligible to receive the Transporter Incentive. Transporters are responsible for establishing contracts or agreements with collection sites and approved processors.

AMS will adopt Stewardship Ontario's Transportation Standards, as posted on Stewardship Ontario's website.

Processors accept used antifreeze, oil containers or oil filters for the purpose of recycling or reprocessing the materials or to ensure they are safely disposed of. AMS will provide the financial incentives established by Stewardship Ontario to processors of used antifreeze containers and oil containers. Processors must be registered with AMS in order to be eligible to receive the Processor Incentive for used antifreeze containers and oil containers. No payment is provided to processors to handle used antifreeze and oil filters. Processors are responsible for establishing contracts or agreements with approved transporters.

AMS will adopt Stewardship Ontario's Processor Standards, as posted on Stewardship Ontario's website.

All transporters and processors that wish to handle used antifreeze, oil containers or oil filters under this ISP must:

- Be registered with AMS;
- Comply with AMS's Vendor Standards;

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<sup>13</sup> Transportation incentives are paid based on four factors: 1) the geographic zone in which materials are being transported, 2) whether the collection location is located in an urban or rural area, 3) the type of material collected, and 4) the current price of fuel.

- Report the quantity of material managed to AMS and submit all required documents to substantiate the information reported; and
- Comply with all Ontario legislative and regulatory requirements if located within the boundaries of Ontario; or
- Comply with all applicable provincial or state legislative and regulatory requirements if located outside of Ontario.



## **F. Affecting Ontario's Marketplace in a Fair Manner**

AMS is proposing to assume responsibility for the entire supply chain for collection and management of used antifreeze, oil containers and oil filters currently under contract to Stewardship Ontario. If any stewards of antifreeze, oil containers or oil filters continue to be registered with Stewardship Ontario after the ISP commences, AMS will contract with Stewardship Ontario for proportional use of the supply chain at a proportionate cost.

AMS is proposing to adopt:

- The service provider vendor standards currently being used by Stewardship Ontario;
- The registrations of service providers currently in place with Stewardship Ontario;
- The rate of remuneration being paid by Stewardship Ontario to municipalities for operation of collection sites accepting used antifreeze, oil containers and oil filters for a minimum of one year; and
- The Transporter Incentive and the Processor Incentive rates being paid by Stewardship Ontario to approved transporters and processors, respectively for a minimum of one year.

As such, the AMS ISP will affect Ontario's marketplace in the same manner that Stewardship Ontario's MHSW Program for used antifreeze, oil containers and oil filters is currently affecting the marketplace.

The commercial terms with service providers will be maintained for at least one year following the commencement of the ISP to minimize disruption during the transition process. Any subsequent changes to the commercial terms will be assessed to ensure that the marketplace is affected in a fair manner and will be subject to consultation with those affected.

## G. Transition Plan

This appendix contains responses to WDO's ISP Transition Plan Guide.

AMS will make every effort to ensure the transition from Stewardship Ontario to AMS is as seamless as possible for all stakeholders.

Stewardship Ontario currently manages automotive materials through the MHSW program. CSSA provides administrative services to Stewardship Ontario, including but not limited to steward reporting, service provider reporting, finance and accounting and communications. AMS intends to contract with CSSA to use the same systems, processes and human resources it employs in the delivery of services to Stewardship Ontario to administer this ISP.

Rather than developing a parallel supply chain, AMS will take over the existing automotive materials supply chain from Stewardship Ontario and maintain it in its current form for at least one year. This will provide stability for collectors, transporters and processors.

As this Transition Plan indicates, the intent is to transition the management of automotive materials with minimal disruption for all stakeholders. It is AMS's intent to provide a period of stability before evaluating opportunities for refinement and optimization.

### 1. What are the proposed changes compared to the existing system?

As described in the ISP, it is the intention of AMS to maintain most of the elements of the MHSW Program as they relate to automotive materials. AMS will:

- Adopt the current collection, transportation and processing standards developed by Stewardship Ontario without adjustment for a minimum of one year;
- Maintain the existing municipal collection channels;
- Pay municipalities the equivalent amount they receive from Stewardship Ontario for the management of automotive materials without adjustment for a minimum of one year;
- Utilize CSSA's WeRecycle reporting portal that stewards and service providers use for the MHSW Program; and
- Partner with Stewardship Ontario for the continued use of the Orange Drop consumer name.

AMS will consult with stakeholders, including municipalities, service providers and stewards, to identify opportunities for continuous improvement.

#### What would change for consumers?

- a) Describe what would and would not change (from the existing system) in the first year of operations, and provide a proposed timeline for implementing those changes.

- AMS will maintain the collection network and consumer facing program name, Orange Drop, used by Stewardship Ontario.
  - AMS will partner with Stewardship Ontario to promote the recycling of automotive materials using the [www.makethedrop.ca](http://www.makethedrop.ca) website.
  - AMS will work with stakeholders to increase the awareness of the program, in particular the availability of service centers that accept automotive materials from consumers.
  - AMS will add additional collection sites over time to improve accessibility and program performance.
- b) Outline what changes (if any) might be expected after the first year of operations, and explain the process that would be used to consider those changes.
- AMS does not have any planned changes at this time.
  - Any changes will be developed after a period of stability and in consultation with affected stakeholders.
- c) Outline and explain how the proposed changes will be communicated to this stakeholder group.
- The transition from Stewardship Ontario to AMS will not be visible to consumers and therefore no communications about the change are required (as this would likely create confusion).
  - AMS will ensure that new publically accessible collection sites are communicated to consumers through [www.makethedrop.ca](http://www.makethedrop.ca).
- d) Outline and explain any changes to consumer accessibility (e.g. collection sites) for recycling services.
- AMS will add additional collection sites to improve accessibility and program performance over time.
  - AMS will ensure that new publically accessible collection sites are communicated to consumers through [www.makethedrop.ca](http://www.makethedrop.ca).
- e) Identify any other changes for consumers.
- AMS will work proactively to improve consumer awareness and participation in the program, working in partnership with Stewardship Ontario, municipalities, and other waste diversion programs.

#### What would change for stewards?

- a) Describe what would and would not change (from the existing system) in the first year of operations, and provide a proposed timeline for implementing those changes.
- Stewards of automotive materials would continue to report quarterly through the WeRecycle portal operated by CSSA, under contract to AMS. Modifications to the WeRecycle portal will be made to keep the reports distinct from reports made to Stewardship Ontario through the WeRecycle portal, but the format and process will remain consistent.

- Participating stewards would report through the WeRecycle portal the quantities supplied to market based on the material definitions as approved by the Minister and included in the MHSW Program Rules for Stewards published by Stewardship Ontario.
  - Participating stewards would continue to receive invoices and be required to pay within 30 days of receipt of the invoice.
  - Participating stewards would be required to sign a membership agreement with AMS to be eligible to join the ISP.
  - Participating stewards will be invoiced in accordance with the terms of the membership agreement.
- b) Outline what changes (if any) might be expected after the first year of operations, and explain the process that would be used to consider those changes.
- AMS does not have any planned changes at this time.
  - Any changes will be developed after a period of stability and in consultation with affected stewards.
- c) Outline and explain how the proposed changes will be communicated to this stakeholder group.
- Reporting instructions will be provided to participating stewards.
  - Under contract to AMS, CSSA's steward services team will work with stewards to assist them with their reports and address any questions they may have.
  - Stewards of automotive materials already have established relationships with CSSA's steward services team.
- d) Outline the proposed changes to the steward's reporting framework and the rationale for those changes.
- Stewards of automotive materials would continue to report quarterly through the WeRecycle portal operated by CSSA. Modifications to the WeRecycle portal will be made to keep the reports distinct from reports made to Stewardship Ontario through the WeRecycle portal, but the format and process would remain consistent.
- e) Discuss the issue of fragmentation from a steward perspective, which could be caused by the need for a steward to report to the ISO (for the ISP materials) and to the IFO (for remaining materials in the 'basket of goods' that would continue to be managed by the IFO).
- Stewards of automotive materials would continue to report quarterly through the WeRecycle portal operated by CSSA. Modifications to the WeRecycle portal will be made to keep the reports distinct from reports made to Stewardship Ontario through the WeRecycle portal, but the format and process would remain consistent.
  - Most stewards of automotive materials also report through the WeRecycle portal for non-automotive MHSW, the Blue Box Program, as well as the printed paper and packaging programs operated by Multi-Material British Columbia, Multi-Material Stewardship Western, and Multi-Material Stewardship Manitoba.

- f) Explain the process for stewards who are a party to the ISP to exit the IFO (e.g. final payments, debt/surplus payments)
  - o Stewards of automotive materials wishing to join the ISP must sign a membership agreement with AMS.
  - o AMS requires that stewards joining the ISP be in good standing with Stewardship Ontario, meaning that they are current on their reporting and payment obligations with respect to automotive materials.

What would change for municipalities?

- a) Describe what would and would not change (from the existing system) in the first year of operations, and provide a proposed timeline for implementing those changes.
  - o The municipal channel accounts for a very small proportion of the total quantity of automotive materials collected in Ontario; however, it is an important channel for householder accessibility that will be maintained by AMS.
  - o In order to achieve the smoothest possible transition, AMS will assume the supply chain obligations of Stewardship Ontario for automotive materials, including the municipal channel. AMS will enter into collection services agreements with municipalities currently providing collection activities for the MHSW Program.
- b) Outline what changes (if any) might be expected after the first year of operations, and explain the process that would be used to consider those changes.
  - o AMS is committed to continuous improvement with respect to the effectiveness and efficiency of the supply chain for automotive materials; however, no changes will be made to the supply chain for a minimum of one year.
  - o Opportunities to increase effectiveness and efficiency will be identified through analysis and consultation with stakeholders as the program matures. An example of a change AMS may consider to increase efficiency is to introduce refinements to the reporting process to reduce the administrative burden on municipalities.
- c) Outline and explain how the proposed changes will be communicated to this stakeholder group.
  - o AMS will work with the Association of Municipalities of Ontario (AMO), the Regional Public Works Commissioners of Ontario (RPWCO) and the Municipal Waste Association (MWA) to communicate with their respective municipal members.
  - o AMS will also contact municipalities under contract to Stewardship Ontario directly to inform them of the changes and to invite them to sign a services agreement with AMS to participate as a collector for the ISP.
- d) Are changes to the collection site standards expected? Provide the new collection site standards, if they are known. Describe the proposed outreach/consultation that would be used to develop additional changes to collection site standards
  - o AMS will adopt the MHSW Collection Site Standards developed by Stewardship Ontario, dated October 1, 2012, for a minimum of one year from the effective date of the ISP.

These standards will be referenced in the services agreement between AMS and municipalities participating as collectors in the ISP.

- AMS will consult with stakeholders to identify ways to improve the efficiency of the collection system and reporting requirements for future years.
- e) Are changes expected to the reporting framework? If so, explain any proposed changes and discuss their potential impact on municipalities (e.g., costs, administrative work). Outline efforts to mitigate any concerns. For example, would a one-window reporting system for municipalities be possible?
- Municipalities participating in the ISP will continue to report through the WeRecycle portal operated by CSSA on the same schedule they report to Stewardship Ontario. Modifications to the WeRecycle portal will be made to keep the reports distinct from reports made to Stewardship Ontario through the WeRecycle portal, but the format and process would remain consistent.
  - Municipalities will only be required to report their quantities collected at events. No other form of reporting to AMS will be required. Municipalities will be paid for Depot collection automatically based on commercial terms in the services agreements.
  - AMS does not expect additional costs to be incurred by municipalities as a result of the reporting framework under the ISP.
- f) Will there be training for municipalities on the new requirements?
- AMS will consult with municipalities on the transition process, including service standards.
  - AMS will publish a reporting guidebook.
- g) Address the extent of fragmentation from a municipal perspective, which could be caused by the need for the municipality to report to the ISO (for the ISP materials), to the IFO (for the remaining materials in the 'basket of goods' that would continue to be managed by the IFO), and/or to other ISOs should WDO approve ISPs for other materials in the 'basket of goods' in the future.
- a. Outline the proposed system for municipal contracts and compensation.
    - Modifications to the WeRecycle portal will be made so that municipalities can continue reporting using the same reporting system they use for the MHSW Program.
  - b. Explain how comingled materials would be addressed.
    - Automotive materials will not be comingled with other materials.
  - c. Outline the ISO's proposed approach and timeline for negotiating new municipal agreements, if municipalities do not agree to accept assignment of the existing IFO-negotiated contracts.
    - AMS will work with AMO, RPWCO and MWA to determine an effective way of communicating with municipalities that wish to participate as collectors to the ISP.

AMS will also contact municipalities under contract to Stewardship Ontario directly to invite them to sign a services agreement to participate as a collector for the ISP.

- o AMS intends to utilize an agreement with a similar form and content to the existing agreement between municipalities and Stewardship Ontario. Specifically, AMS will:
  - Assume the automotive materials share of payments to municipalities for depot collection services as set out in the January 1, 2014 amended agreement between each municipality and Stewardship Ontario;
  - Ensure automotive materials collected by participating municipalities are picked up by a registered transporter for delivery to a registered processor for recycling; and
  - Provide payment on a per tonne basis for automotive materials collected at events and subsequently transported to a processor for recycling.
- o If any agreements are not returned to AMS by the effective date of the ISP, the payments for depot hours and automotive materials collected at events will be paid retroactively upon receipt of the signed agreements, provided that the signed agreements and all reports are received by the end of the calendar year in which the ISP becomes effective.
- o Municipalities that do not sign services agreements may make a request directly to a registered transporter that they pick-up and deliver to a registered processor any quantity of automotive materials collected by the municipality. There will be no charge to the municipality for this service.

h) If the ISP would impact any contracts between municipalities and waste management companies, then describe how the ISO proposes to address these impacts

- o AMS does not expect that the ISP will have any impact on existing contracts between municipalities and their service providers, if the ISP is approved.

i) Establish a plan to provide and consult with municipalities on an operational plan before full implementation of the plan, if this ISP is approved

- o AMS will work with AMO, RPWCO and MWA to determine an effective way of communicating with municipalities that wish to participate as collectors to the ISP. AMS will also contact municipalities under contract to Stewardship Ontario directly to invite them to sign a services agreement to participate as a collector for the ISP.
- o During the transition period, the following activities are proposed, and will be reviewed with stakeholders, including the municipal associations:

<b>Prior to Approval Date</b>	
	Consult with municipal associations and individual municipalities on supply chain transition and municipal contract arrangements
	Prepare municipal automotive materials services agreement
	Consult with municipal associations on the development of a communications plan
<b>Approval Date</b>	

Month 1	Implement communications plan
	Distribute municipal automotive materials services agreements to municipalities
	Begin modifications to the WeRecycle portal
Month 2	Continue to implement communications plan
	Continue with modifications to the WeRecycle portal
	Update reporting guidebooks
	Consult with Stewardship Ontario on remaining supply chain transfer activities
Month 3	Continue to implement communications plan
	Test and finalize the modifications to the WeRecycle portal
	Publish reporting guidebooks and issue reporting IDs

What would change for service providers?

- a) Describe what would and would not change (from the existing system) in the first year of operations, and provide a proposed timeline for implementing those changes. For example, are there any changes proposed for:
- Collection channels?
  - Collection, transportation, or processing standards?
  - Compensation?
  - Reporting?
- There are no changes contemplated for these items during the first year.
  - No changes will be made to the supply chain during the first year of operations.
  - Opportunities to increase effectiveness and efficiency will be identified through analysis and consultation with stakeholders as the program matures.
  - The commercial channel accounts for a large proportion of the total quantity of automotive materials collected in Ontario. Transporters service approximately 12,000 commercial collection sites and all municipal collection depots.
  - In order to achieve the smoothest possible transition, AMS will assume the supply chain obligations of Stewardship Ontario for automotive materials, including the Automotive Incentive Program.
  - AMS will maintain the nine zones and associated rates for rural and urban collection used by Stewardship Ontario.
  - AMS will adopt the collection, transportation and processing standards developed by Stewardship Ontario.
  - AMS will automatically accept transporters and processors currently registered with Stewardship Ontario based on Stewardship Ontario's declaration that each of these service providers meets the minimum qualifications and standards.
  - Service providers will continue to report using the WeRecycle portal.



- Within the first six months, service providers will be asked to sign a services agreement stating their agreement to comply with the collection, transportation and processing standards.
- b) Outline what changes (if any) might be expected after the first year of operations, and explain the process that would be used to consider those changes.
- AMS is committed to continuous improvement with respect to the effectiveness and efficiency of the supply chain for automotive materials
  - No changes will be made to the supply chain during the first year of operations.
  - Opportunities to increase effectiveness and efficiency will be identified through analysis and consultation with stakeholders as the program matures. An example of a change AMS may consider to increase efficiency is to introduce automation to the reporting process to reduce the administrative burden on service providers.
- c) Outline and explain how the proposed changes will be communicated to this stakeholder group.
- AMS will contact service providers directly to discuss the ISP and any concerns they have during the transition.
- d) Discuss how any existing service provider contracts between IFOs, municipalities or collection sites would be addressed (e.g., would they be assigned?).
- AMS will seek the assignment of collection contracts for the Specialty Services channel. In the event that the contracts cannot be assigned, AMS will seek to enter into new agreements with these collectors.
- e) Discuss any changes to how service providers would be selected for the new system (e.g., eligibility requirements, RFP process, etc.), and the timelines for implementing those changes.
- a. All transporters and processors that meet AMS's minimum requirements and standards may participate as a service provider. Details on eligibility requirements and how to register will be posted on our website if the ISP is approved.
  - b. Eligibility requirements and the registration process used by Stewardship Ontario will be adopted.
- f) Establish a plan to provide and consult with service providers on an operational plan before full implementation of the plan, if this ISP is approved
- During the transition period, the following activities are proposed, and will be reviewed with stakeholders:

<b>Prior to Approval Date</b>	
	Inform service providers of AMS's application for an ISP
	Develop a communications plan
<b>Approval Date</b>	
Month 1	Implement communications plan
	Begin modifications to the WeRecycle portal

Month 2	Continue to implement communications plan
	Continue modifications to the WeRecycle portal
	Update reporting guidebooks
	Consult with Stewardship Ontario on remaining supply chain transfer activities
Month 3	Continue to implement communications plan
	Test and finalize the modifications to the WeRecycle portal
	Publish reporting guidebooks

## 2. Outstanding Issues and Making Changes after the ISP's Approval

- a) If after the ISP is approved, the ISO determines that additional changes are required to those proposed in the ISP, explain the ISO's process for consultation with affected stakeholders.
  - o As described in the ISP and in this Transition Plan, it is the intention of AMS to maintain existing program operations for automotive materials as they currently exist in the MHSW program while seeking opportunities for continuous improvement. For any proposed changes, AMS will consult with affected stakeholders. Methods of consultation could include written or oral communication, one-on-one and group meetings, committee meetings, and newsletters.
  - o AMS will also consult with industry associations representing the stewards including the Automotive Industry Association, the Canadian Vehicles Association, and the Global Automakers Association.
- b) Discuss how the proposed changes will be communicated to stakeholders.
  - o For municipalities, AMS will interact with WDO, AMO, RPWCO and MWA, and has discussed the establishment of an ISP-municipal transition committee. Where committees are involved, communication would initially take place at the committee level, and then a decision would be made about how to best disseminate information to and receive feedback from participating municipalities. If appropriate for a particular issue, special committees can be set up which may include stakeholders such as stewards or service providers.
  - o AMS will communicate directly with stewards participating in the ISP program.
- c) Outline any other outstanding concerns that would be addressed between the ISO and each stakeholder group.
  - o Because of the competitive nature of the role of the service providers, discussions will take place one-on-one directly but, for certain topics, group meetings may be appropriate. AMS has also consulted with Ontario Waste Management Association, an organization to which many of the service providers belong.

## 3. How would program performance change?

- a) Explain how the ISO expects program performance could change in the first year and thereafter.

- Given that AMS intends to assume the full supply chain for automotive materials from Stewardship Ontario, and AMS intends to add additional collection sites each year, it is expected that performance will increase under the ISP.
- b) Discuss the challenges the ISO could face in transitioning the system
- Given that AMS intends to assume the full supply chain and service standard and to continue using CSSA's WeRecycle portal for steward reporting and service provider reporting, the transition of the ISP is not expected to result in any major challenges.
- c) Outline the steps the ISO would take to monitor the transition, especially those discovered in the first year.
- AMS will continually monitor program performance against targets and performance results published by Stewardship Ontario for previous quarters.
  - AMS will maintain close contact with municipalities and service providers in order to identify any issues at the earliest possible stage and take appropriate steps to resolve them.

**4. Explain any changes to how materials would be recycled.**

- a) Discuss the processes and end-uses that would or could be used, and the rationale for the changes.
- No changes are proposed to the processes and end uses currently employed by Stewardship Ontario. The recycling efficiency rates are currently 100% for each of the automotive materials.

**5. Identify any challenges that would need to be addressed between the ISO and IFO.**

- a) Outline any outstanding concerns
- It is possible that some stewards of automotive materials will not join the ISP. Should this occur, AMS will establish arrangements with Stewardship Ontario so that Stewardship Ontario can utilize a proportionate share of the supply chain being assumed by AMS under the ISP.
  - AMS and Stewardship Ontario have agreed to enter into discussions to minimize the risk of financial impact to Steward Ontario as a result of the ISP.

**6. Prepare a Communications Strategy & Materials for Transitioning to the New System**

- a) Describe the expected communications strategy to communicate the transition from the existing system to the new system to key stakeholder groups
- AMS intends to continue consulting with stakeholders prior to WDO approval of the ISP, during the transition period, and following the effective date. The manner in which AMS will communicate with these stakeholder groups depends on the type of message, the urgency, and the preferences of the stakeholders. Methods of communication may include written or oral communication, meetings, conference calls or webinars.

- For municipalities, consultation will be accomplished through existing channels, such as committees and newsletters of the three municipal associations. AMS will also communicate directly with individual municipalities currently under contract with Stewardship Ontario to convey the changes and receive feedback. If determined to be necessary, AMS will strike a special transition committee with representatives from municipalities and/or municipal associations.
- For service providers, AMS will contact service providers currently under contract with Stewardship Ontario directly to discuss the transition to the ISP and to respond to any questions they may have.
- AMS recognizes the importance of engaging with generators of automotive materials to ensure these materials are collected and recycled safely. AMS will develop promotion and education materials as described in the ISP and will advertise the location of public drop off locations online.
- AMS will communicate directly with stewards who choose to participate in the ISP or who express an interest in participating in the ISP. AMS will also continue consulting with industry associations representing stewards of automotive materials, such as the Automotive Industry Association and the Global Automakers Association.
- AMS will seek opportunities to jointly communicate to stakeholders with Stewardship Ontario.

**7. Provide a Summary of the Proposed Timeline for Implementation of the ISP.**

- a) Provide a timeline (e.g., graphic) that includes key activities and dates for key announcements/decision points. Include activities proposed for before and after the ISP’s consideration by the WDO Board.
- o Under this ISP, the program is proposed to take effect on the first day of the first month 3 months following the approval date (hereafter referred to as the effective date).
  - o The following table is based on a 3 month transition period but the timelines can be extended if a longer transition period is directed by WDO. AMS may make adjustments to the timelines of individual items to ensure a smooth and effective transition.

<b>ISP Development and Review Task List</b>	<b>Timeline</b> AD – Approval Date ED – Effective Date
<b>ISP Review Process / WDO</b>	
Submission of ISP and Transition Plan to WDO staff following completion of WDO consultation	15 days prior to AD
Decision of WDO Board on ISP proposal	AD
<b>Stewardship Ontario</b>	
Discuss transfer of the supply chain for automotive materials	Ongoing
Negotiate agreement for sharing of the supply chain for those stewards of automotive materials that choose to remain with Stewardship Ontario	Ongoing
Finalize strategy for steward recruiting effort	Ongoing
Joint communication with Stewardship Ontario to stewards to communicate the status of the ISP, the resolution of any outstanding obligations, and the method to join the ISP	AD + 0-30 days
<b>Stewards</b>	
Finalization of budgeting and communication of draft fee schedule	60 days prior to ED
Notification to all Stewards of steps required to formalize participation in ISP and exit Stewardship Ontario	60 days prior to ED
Steward registration and reporting system	60 days prior to ED
Publication of reporting guidebook	60 days prior to ED
Registration of initial pool of stewards complete; AMS reports stewards who are members of the ISP as of the effective date to WDO and Stewardship Ontario	30 days prior to ED
End of first reporting period for steward	ED
Stewards must have paid their first quarter invoice to AMS	ED + 30 days
Meeting to review program operations with stewards	ED + 180 days
<b>Municipalities</b>	
Distribute ISP services agreements	90 days prior to ED
Review reporting and claims system and supporting documentation requirements	AD + 0 – 30 days
Consultation on supply chain transfer steps	AD + 0 – 30 days
Publication of reporting guidebook	30 days prior to ED

<b>ISP Development and Review Task List</b>	<b>Timeline</b> AD – Approval Date ED – Effective Date
<b>Service Providers</b>	
Review reporting and claims system and supporting documentation requirements	AD + 0 – 30 days
Consultation on supply chain transfer steps	AD + 0 – 30 days
Publication of reporting guidebook	30 days prior to ED