

The Successful Integration of P2 in a Provincial Regulation for Automotive Recyclers

- The Auto-Recycling Sector (the Good, the Bad and the Ugly)
- The EMS for the Sector
- Integration of P2 into EMS
- Need for Regulation
- Next Steps

About the Auto-Recycling Sector

- All small businesses - about 125 in BC;
- Dismantle end-of-life vehicles for parts;
- Process about 35% of ELVs or about 40,000 ELVs annually in BC;
- Steel Recyclers are different
 - small to medium sized businesses;
 - focus on steel and other metals
 - “grinders” and “squashers”

About the Auto-Recycling Sector

- Auto-Recyclers provide a vital environmental, economic and social role in Canada;
 - they are “*Solution Providers*”
- In Canada, the reuse and recycling of parts and metals;
 - saves 8 Million barrels of oil annually;
 - provides \$400 Million of economic activity; and,
 - employs over 5000 people.
- Yet these vital roles do not give Auto-Recyclers a right to pollute.
 - Recent Government study showed 80% out of compliance

Auto-Recycling Practices



Examples of
The Good, The Bad and The Ugly











GRIME TRAP II
100% CLOSED-LOOP PARTS WASHER







The Challenges



- Reward the Good;
- Improve the Ugly;
- Solution: Develop an sustainable Environmental Management System for then auto-recycling sector.

About the Solution

- AREA - Automotive Recyclers' Environmental Association
 - non-profit association;
 - membership voluntary - no barriers to membership;
 - mission is to develop and implement an EMS in BC;
- EMS is like all others:
 - Identifies Env. Aspects, Legal Requirements
 - Provides Training and Inspection Programs
 - Reports on Annual Performance of the Sector

Inspection Program

- EMS includes a CoP - minimum requirement;
- EMS includes BMPs (code word for P2);
- Inspection program IS quantified and the results normalized so that PERFORMANCE can be tracked over time and auto-recyclers can be compared

Quantification of Performance

- For each Environmental Aspect there are CoP requirements and BMPs (code word for P2)
- Each Environmental Aspect is assigned a maximum score based on risk (range 5 to 30).
- Fail to meet the CoP - get an “F” and score 0;
- BMPs given score based on the amount of P2;
- At the end of the inspection - add up their score

Annual Report



- Publish the annual results for all the recyclers in ranked order (Good to Ugly)
- To improve ranking - implement P2
- Seems simple but need a mechanism to handle the Ugly that do not implement P2

Enforcement of CoP

- Here is the link to Regulation - need to enforce the CoP if no change in performance.
- City of Abbotsford in 2000:
 - named AREA's CoP within a by-law;
 - the 11 recyclers must be in compliance with CoP.
 - No business licence if out of compliance.

Provincial Regulation

- Province to integrate the auto-recycling CoP into the *Waste Discharge Regulation (WDR)*;
- Essentially, the WDR:
 - defines the auto-recycling sector;
 - requires all auto-recyclers to be in compliance with a CoP that is approved by the Minister;
 - industry works with Regulators to develop CoP that is approved by the Minister;
 - AREA's EMS monitors performance;
 - Province enforces regulation if non-compliance.

Observations



- Need to be able to charge the Ugly otherwise you are punishing the Good;
- Performance must be quantified because P2 is driven by peer pressure;
- Regulations can point to CoP developed by industry.
- Independent organizations can do the monitoring and reporting;
- Government does enforcement if necessary.