

**MANITOBA ASSOCIATION
FOR RESOURCES RECOVERY CORP.
(MARRC)**

**ANTIFREEZE
STEWARDSHIP PROGRAM**

JULY 2010

PREPARED FOR

**MANITOBA CONSERVATION
SUITE 160
123 MAIN STREET
WINNIPEG MANITOBA
R3C 1A5**

**MANITOBA ASSOCIATION FOR RESOURCE RECOVERY CORP.
(MARRC)**

**APPLICATION FOR APPROVAL OF THE ANTIFREEZE
STEWARDSHIP PROGRAM**

WITHIN THE

**HOUSEHOLD HAZARDOUS MATERIAL AND PRESCRIBED MATERIAL
STEWARDSHIP REGULATION**

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1.0 EXECUTIVE SUMMARY

1.1 Introduction

The Manitoba Association for Resource Recovery Corp. (MARRC) manages Manitoba's Used Oil Products Recycling Stewardship Program.

The Antifreeze industry suppliers, namely Honeywell, Recochem and Laurentide approached MARRC to consider coordinating and developing through stakeholder input, the business plan proposal and application for submission to the Minister of Conservation.

MARRC accepted the arrangement and is hereby submitting the Stewardship Program Plan for approval.

1.2 Public Consultation

MARRC Participated in a Public Consultation Meeting with a Webinar included on June 21, 2010 in Winnipeg.

The Agenda and structure was as follows:



Public Consultation: Manitoba Household Hazardous Waste Stewardship Programs And Commercial Pesticide Container Stewardship Program

- **Manitoba Conservation's Household Hazardous Material and Prescribed Material Stewardship Regulation**
 - Gazetted Feb. 2010
 - Consultation – June 21st, 2010
 - Comment Period – July 9th, 2010
 - Program Submissions – August 3rd, 2010 to Green Manitoba
 - Types of household hazardous waste and prescribed material:
 - domestic pesticides,
 - pharmaceutical products
 - natural health products
 - automotive antifreeze
 - paint products
 - fluorescent lighting products
 - lead-acid automotive batteries
 - rechargeable batteries
 - other batteries.



Recochem, Honeywell and Laurentide Management were in attendance in support of the MARRC presentation.

MARRC has received no public responses in follow-up to the content of the presentation specific to Antifreeze.

1.3 Components of MARRC's Used Oil Stewardship Program

The Manitoba Association for Resource Recovery Corp. (MARRC) is a non-profit corporation established in 1997 by the manufacturers and marketers of lubricating products in Manitoba. MARRC was incorporated under The Corporations Act of Manitoba on April 1, 1997. Its mandate was to develop, implement and administer a cost-effective, sustainable, user-financed, province-wide stewardship program for used oil, used oil filters and used oil containers.

It operates in accordance with a Letter of Approval issued by Manitoba Environment on February 26, 1998 under Section 7 of the "Used Oil, Oil Filters and Containers Stewardship Regulation" of the Waste Reduction and Prevention Act.

MARRC received a letter of approval dated December 21, 2007 from the Minister of Conservation extending the Stewardship Plan term for an additional five years to December 14, 2012.

MARRC derives revenue principally in the form of Environmental Handling Charges (EHCs) applied to the sale or consumption of selected lubricating products in Manitoba. The Corporation's primary expenses are related to the:

- ◆ establishment and operation of a publicly-accessible network of licensed collection activities
- ◆ payment of Return Incentives (RIs) to companies licensed by the province and registered with MARRC to collect used lubricating products and transfer them to approved processors and end-users
- ◆ payment of Processing Incentives to companies licensed by the province and registered with MARRC to recycle used oil containers
- ◆ development of public education materials and promotions.

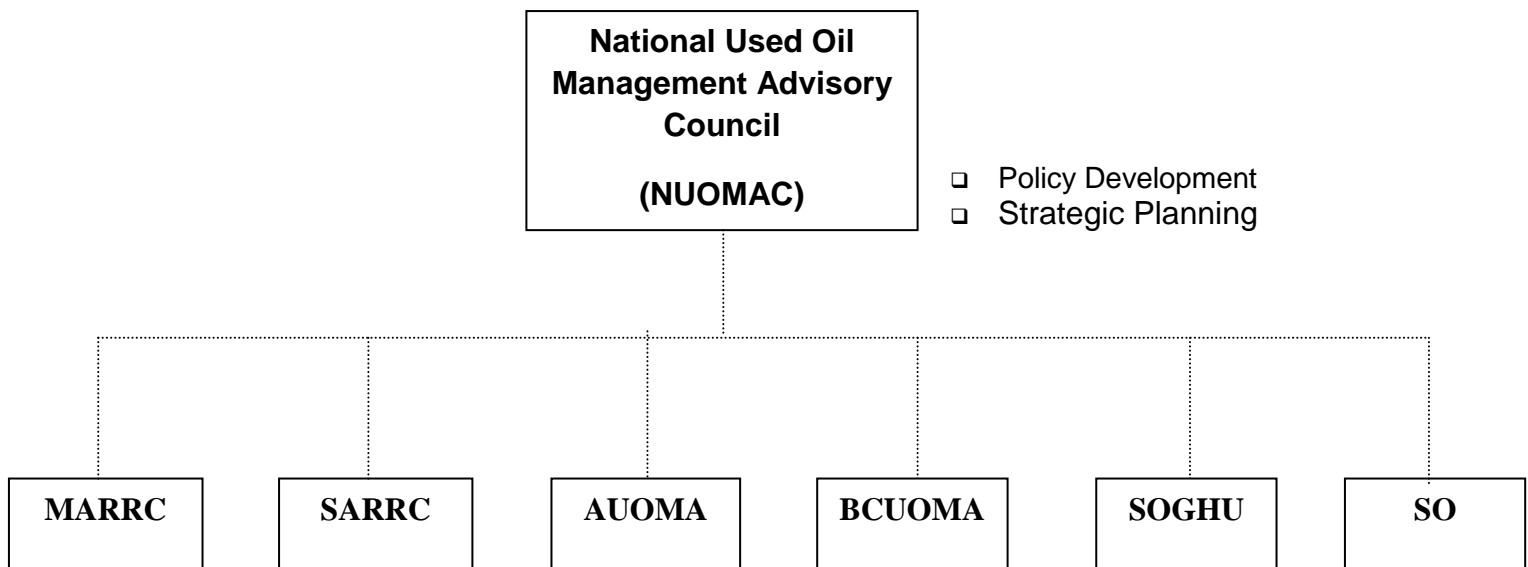
MARRC's affairs are managed by a six-person Board of Directors drawn from the member companies of MARRC and from other stakeholder organizations.

1.4 MARRC's Affiliation with Other Provinces

Mandate:

- ◆ Reflect the overall strategy of the National Used Oil Management Advisory Council (NUOMAC). The Council consists of the Chairman and the Executive Director of each of the 6 Associations
 - ◆ Maximize commonality with the programs of AUOMA, SARRC, BCUOMA, SOGHU and Stewardship Ontario (SO)
 - ◆ Reflect the Statement of Principles of the multi-stakeholder Manitoba Used Oil Management Committee.
 - ◆ Comply with the Used Oil, Oil Filters and Containers Stewardship Regulation.
-

The Figure below illustrates the relationship amongst NUOMAC, MARRC, SARRC, AUOMA, BCUOMA, SOGHU and SO.



2.0 ANTIFREEZE

2.1 HHW Program Definition

- ◆ Antifreeze that is used or intended for use as a vehicle engine coolant (passenger car and heavy duty) sold for residential (consumer or DIY use) and IC&I (installed or DIFM use).
 - Includes Packaged Antifreeze and their containers (30L or less) and Bulk Antifreeze (greater than 30L)
 - Excludes Initial 'factory fill' product
 - Includes ethylene glycol and propylene glycol used or intended for used as a vehicle engine coolant.

2.2 Profile

- ◆ When used in a cooling system antifreeze must be diluted
 - 50%/50% water and antifreeze (manufacturer recommended)
 - Max 30% water and 70% antifreeze (for very cold conditions)
- ◆ Used Antifreeze available for collection is therefore always pre-diluted.
 - Extended Life Antifreezes are in most cars today and mean that the total volumes sold in the market are in decline due to extended drain intervals for cooling systems.
 - This means the total amount available for collection is also in decline.

2.3 Trends / Issues

- ◆ More volume is available for recovery than sold
 - 50% of market is concentrate
- ◆ A high percentage of recovery is through auto service centres (DIFM)
- ◆ Containers are a byproduct of handling at municipal sites & through DIY

3.0 USED OIL SYNERGIES WITH ANTIFREEZE

- ◆ Retail stewards of oil are in many cases stewards of antifreeze:
 - e.g. Auto car dealers
 - Service Bay Shops
 - Big Box Service Bays (e.g. Canadian Tire)
 - Fast lubes

- ◆ Commercial stewards with large trucking and equipment fleets, often service their own vehicles with oil changes and antifreeze.

- ◆ In terms of convenience, MARRC currently has 65 rural licensed depots which are effectively positioned on average within 30 minutes of accessibility (as required by the Used Oil Regulation).

In the city of Winnipeg, MARRC also has 10 licensed collection sites providing convenience within 10 minutes of accessibility, (again as required by the Used Oil Regulation).

Included in the 10 are 6 Canadian Tire sites that provide further convenience by being open during the weekday evenings and weekends of Saturday and Sunday.

MARRC's licensed EcoCentre locations can easily accommodate the addition of antifreeze and the containers. (An amendment to the license would be requested)

3.0 USED OIL SYNERGIES WITH ANTIFREEZE (Continued)

- ◆ We currently have, during peak periods, as high as 33% contamination of antifreeze and windshield washer fluid containers in the bags of used oil containers.

I.e. A Return Incentive (RI) is being paid with no EHC recovery!

- ◆ MARRC's Registered Collectors, who are currently picking-up used oil, filters and containers, are very receptive and willing to add antifreeze and containers to their product line. Two collectors are already actively doing so

- ◆ The Collector infrastructure is based on Return Incentive (RI Rates)

The Rates increase the further the mileage from Winnipeg to dissuade 'cherry-picking' inside the perimeter

- ◆ MARRC has a Membership Agreement in place with its 160 Members. The addition of antifreeze can be easily accommodated through an amendment to the Agreement.

- ◆ MARRC currently has significant communication and promotion activities in place.

To further enhance awareness, MARRC would add antifreeze and containers into the mix of its communication and promotional material.

4.0 COLLECTION INFRASTRUCTURE

- The following is a listing of the **75** Licensed used oil EcoCentre depots owned and operated in Manitoba including the 10 sites in Winnipeg.



EcoCentres

Location	Owner/Operator
1 Steinbach	City of Steinbach
2 Carman	Town of Carman
3 Melita	S K L Enterprises Ltd.
4 Altona	Town of Altona / RM of Rhineland
5 Neepawa	Town of Neepawa
6 Selkirk	City of Selkirk
7 Russell	Town of Russell / RM of Russell / RM of Silver Creek
8 Glenboro	RM of South Cypress / Village of Glenboro
9 Minto	RM of Whitewater
10 Pilot Mound	Town of Pilot Mound
11 Baldur	RM of Argyle
12 Swan River	Town of Swan River
13 Hamiota	Town of Hamiota
14 Inwood	RM of Armstrong
15 Chatfield	RM of Armstrong
16 Meleb	RM of Armstrong
17 Virden	RM of Wallace
18 Arborg	Town of Arborg / RM of Bifrost / Village of Riverton
19 Gladstone	Town of Gladstone
20 Rosburn	Town of Rosburn / RM of Rosburn
21 Portage la Prairie	Portage & District Recycling Inc.
22 Teulon	Town of Teulon / RM of Rockwood
23 Brandon	City of Brandon
24 Earl Grey	RM of St. Andrews
25 Langruth	RM of Lakeview
26 Elm Creek	RM of Grey
27 The Pas	Town of The Pas

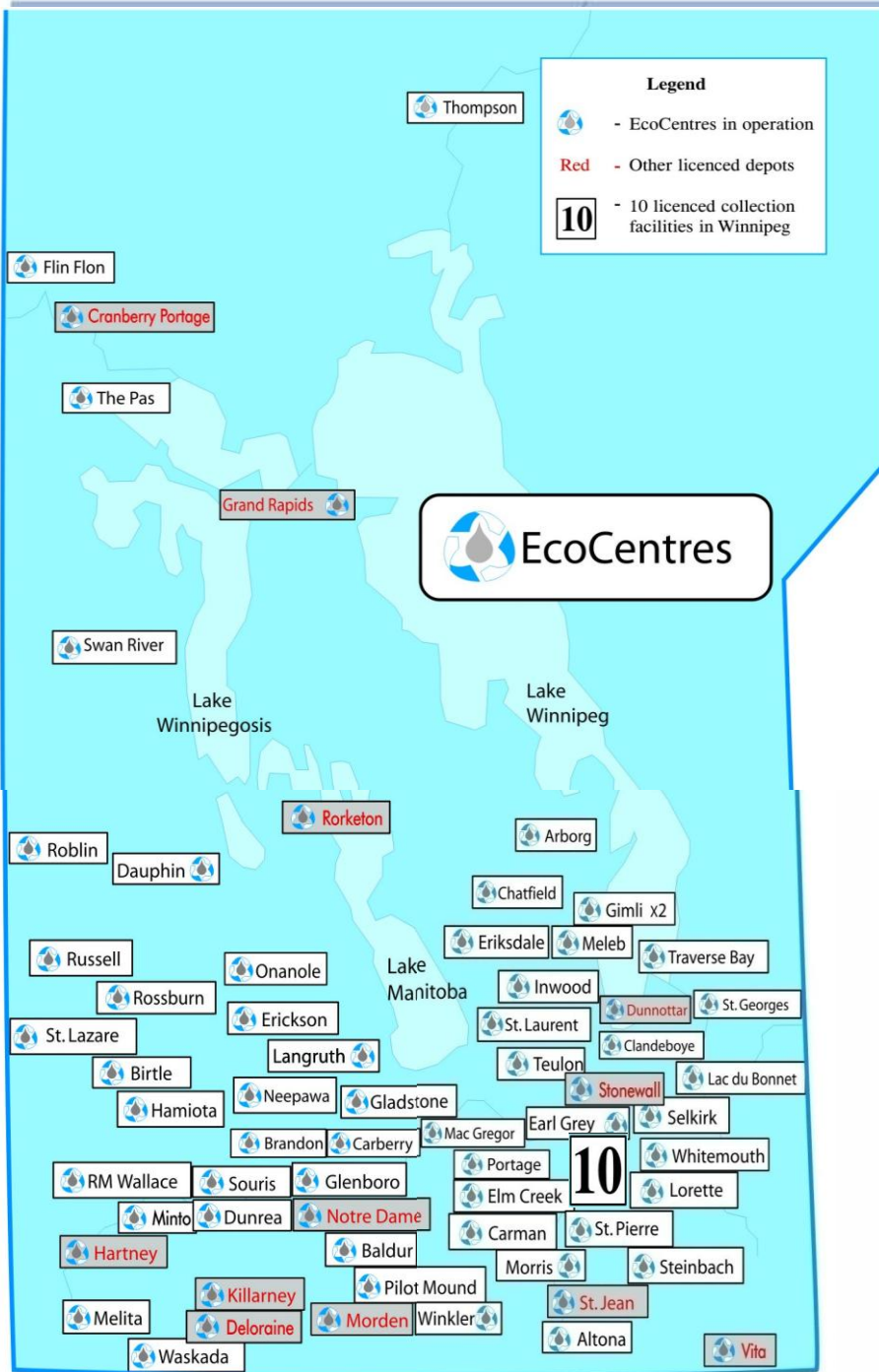
Location	Owner/Operator
28 Winkler	City of Winkler
29 Morris	Town of Morris
30 St. Georges	RM of Alexander
31 Traverse Bay	RM of Alexander
32 Clandeboye	RM of St. Andrews
33 Dauphin	EcoOil Recycling Centre
34 Lac du Bonnet	RM of Lac du Bonnet
35 Waskada	RM of Brenda / Village of Waskada
36 Carberry	RM of North Cypress
37 Thompson	Thompson Recycling Centre
38 St. Laurent	RM of St. Laurent
39 Erickson	Town of Erickson / RM of Clanwilliam
40 Eriksdale	RM of Eriksdale
41 Flin Flon	City of Flin Flon
42 Dunrea	RM of Riverside
43 MacGregor	RM of North Norfolk / Village of MacGregor
44 Roblin	RM of Shell River / RM of Hillsburg
45 Onanole	RM of Park
46 Gimli	RM of Gimli
47 Arnes	RM of Gimli
48 Whitemouth	RM of Whitemouth / RM of Reynolds / North Whiteshell Provincial Park
49 St. Lazare	RM of Ellice / Village of St. Lazare
50 St. Pierre	RM of De Salaberry / Village of St. Pierre-Jolys
51 Lorette	RM of Taché
52 Souris	Town of Souris / RM of Glenwood
53 Birtle	Town of Birtle / RM of Birtle

Other Licenced Collection Facilities

1 Winnipeg	A-1 Environmental Services 1447 Dugald Road
2 Winnipeg	Enviro West Inc. 1090 Kenaston Blvd.
3 Winnipeg	Miller Environmental Corporation 65 Trotter Bay
4 Winnipeg	WRS Waste & Recycling Services 940 Redonda
5 Winnipeg	Canadian Tire Garden City 2303 McPhillips
6 Winnipeg	Canadian Tire East Kildonan 1519 Regent Ave.
7 Winnipeg	Canadian Tire Polo Park 750 St. James
8 Winnipeg	Canadian Tire Fort Garry McGillivray & Kenaston
9 Winnipeg	Canadian Tire St. Boniface Farmor & Beaverhill
10 Winnipeg	Canadian Tire Unicity 3615 Portage Ave.
11 Stonewall	Southside Service

12 Notre Dame	Jean Farms Ltd.
13 Morden	Pembina Valley Containers Ltd. .
14 Hartney	Southwest Recycling
15 Grand Rapids	ET Developments Ltd.
16 Killarney	Town of Killarney
17 St. Jean	Miller Environmental Corporation
18 Dunnottar	Village of Dunnottar
19 Cranberry Portage	LUD of Cranberry Portage
20 Rorketon	RM of Lawrence
21 Vita	RM of Stuartburn
22 Deloraine	RM of Winchester

4.0 COLLECTION INFRASTRUCTURE – LOCATION MAP



4.0 COLLECTION INFRASTRUCTURE – RETAIL

MARRC, with approval from oil executive management, has provided on a test basis a container at the pump islands to facilitate the disposal of empty oil containers at the service station sites.

Containerization at Pump Island

Distribution:

Winnipeg Pilot Project at
36 Retail Gasoline Locations

ESSO / Pioneer – 18

Red River Co-op – 12

Canadian Tire – 4

Mac's – 2



4.0 COLLECTION INFRASTRUCTURE – MARRC REGISTERED COLLECTORS

WRS Environmental
Attention: Ric Henkel
940 Redonda St.
Winnipeg Manitoba
R2E 0G9

Enviro West Inc.
Attention: Norm Klippenstein
1090 Kenaston Blvd.
Winnipeg, Manitoba
R3P 0R7

Miller Environmental Corporation
Attention: Paul Leonard
1803 Hekla Ave.
Winnipeg Manitoba
R2R 0K3

Northern Environmental Recovery Ltd.
Attention: Ward Wallaker
108 Lee Street
Creighton, SK.
S0P 0A0

A-1 Environmental Services
Attention Ernie Rousseau
1447 Dugald Road
Winnipeg Manitoba
R2J 0H3

EcoOil Recycling Centre
Attention: Todd Tarrant
1 Mile East on Hwy #20
Dauphin, Manitoba
R7N 2V4

United Chemical Services
Attention: Tom Screawn
708 Greenwood Ave.
Selkirk, Manitoba
R1A 2B2

Kendaula Enterprises
Attention: Kendall Goosen
Box 315
Rosenort, Manitoba
R0G 1W0

Jean Farms Ltd.
Attention: Jean Dizengremel
151 Notre Dame Ave. W.
Notre Dame de Lourdes, MB
R0G 1M0

These MARRC Registered Collectors are currently servicing generators throughout Manitoba for used oil filters and used oil containers.

They are very receptive to add antifreeze and containers to their product line.

5.0 COMMUNICATIONS

MARRC has 3 key strategic elements that are highlighted within its Communication initiatives:

- ◆ Creating and enhancing awareness
- ◆ Promoting convenience of the licensed EcoCentre network
- ◆ Partnering effectively

e.g. Canadian Tire
Home Hardware
Winnipeg Goldeyes
Future Shop
Winnipeg Free Press

See Appendix for Highlights from the 2009, 2008 and 2007 Annual Reports demonstrating MARRC's commitment in that regard.

6.0 ANTIFREEZE MARKET

6.1 Sales Estimates

The following report represents results of a recent survey for 12 months industry sales.

<u>MARRC Survey Responses</u>		Sales Summary 12 months			
Type of container (volume in litres)	Concentrate Antifreeze (number of containers)	Pre-mix plus or minus 50 - 50 (number of containers)	Total Concentrate Antifreeze (litres)	Total Pre-mix plus or minus 50- 50 (litres)	Total Windshield washer antifreeze (number of containers)
150ml		247		37	
1	10,080	11,040	10,080	11,040	0
1.5	76	50	114	75	50
1.89	19,416	14,168	36,696	26,778	0
2	0	197	0	394	0
3.78	238,063	59,043	899,878	223,183	359,627
4	141,209	48,844	564,836	195,376	398,579
5	56	115	280	575	100
7.56L	376	360	2,722	2,722	0
9.46	32,345	2,947	305,984	27,879	9,834
10	4,324	7,926	43,240	79,260	
15	0	0	0	0	9,859
18.9	0	34	0	643	0
20	1,895	868	37,900	17,360	1,020
70	8	2	560	140	71
205	932	608	191,060	124,640	1,438
BULK			82,630	19,229	5,000
TOTAL	448,780	146,449	2,175,980	729,331	785,578
SUB TOTAL 50/50 in litres			4,351,960	729,331	
Grand Total 50/50 mix			5,081,291		

6.0 ANTIFREEZE MARKET

6.2 Net Collectable

Sales/Collectable Volumes (K – Litres)

2009 ESTIMATED ACTUALS

SALES

Concentrate	2,175
	<u>X 2</u>
	4,350

Plus Pre-mix 50/50	<u>730</u>
	5,080

Less

Lost in Service - 55%	- <u>2,795</u>
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NET COLLECTABLE	2,285
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2009 Estimated Collected	304 =	13.3%
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6.0 ANTIFREEZE MARKET

6.3 Proposed Recovery Estimates Fluid/Bulk (Years 1 to 5)

Fluid/Bulk (K-Litres)

NET COLLECTABLE	2,285	←	
		↓	
			<u>%</u>
2009 Recovery est.	304	←	13.3
Targets	Volume		Recovery
Year 1	412		18.0
Year 2	526		23.0
Year 3	640		28.0
Year 4	755		33.0
Year 5	915		40.0

6.0 ANTIFREEZE MARKET

6.3 Proposed Recovery Estimates Containers (Years 1 to 5)

Estimated collectable 5,080,000 litres

Less bulk 102,000
NET 4,978,000 litres

Conversion to Kgs ÷ 15.1 = 330,000 Kgs ←

NET COLLECTABLE 330,000 Kgs

2009 Used Oil Collection 232,000 Kgs

Estimated Antifreeze "contamination" 10% = 23,200 Kgs ←

%

2009 Recovery est. 23,200 7

Targets	Volume (Kgs)	Recovery
Year 1	49,500	15
Year 2	66,000	20
Year 3	82,500	25
Year 4	99,000	30
Year 5	115,500	35

7.0 FINANCIAL MODEL

7.1 Environmental Handling Charge Revenue

	<u>Volume</u>	<u>EHC Rate</u>	<u>Revenue</u>
Fluid	5,080,000	@\$0.05 (1)	\$254,000
Containers	4,978,000	@\$0.10 (2)	<u>497,800</u>
			751,800

(1) Current Used Oil Rate \$0.05

(2) Proposed Used Oil Containers Rate \$0.10

Awaiting approval from Minister

7.0 FINANCIAL MODEL

7.2 Return Incentive (RI Rates)

	<u>FLUID (\$/Litre)</u> (1)	<u>CONTAINERS (\$/Kg)</u> (2)
Zone 1	.30	1.69
Zone 2	.38	1.80
Zone 3	.38	1.80
Zone 4	.40	1.85
Zone 5	.42	1.90
Zone 6	.45	1.95
Zone 7	.55	2.10

(1) Two MARRC Collectors are actively collecting Antifreeze in Manitoba at \$65 per drum which equates to \$0.32 per litre

(2) The container rates equate to the MARRC proposal for increase of \$0.50 per Kg per Zone with used oil containers (awaiting approval from Manitoba Conservation)

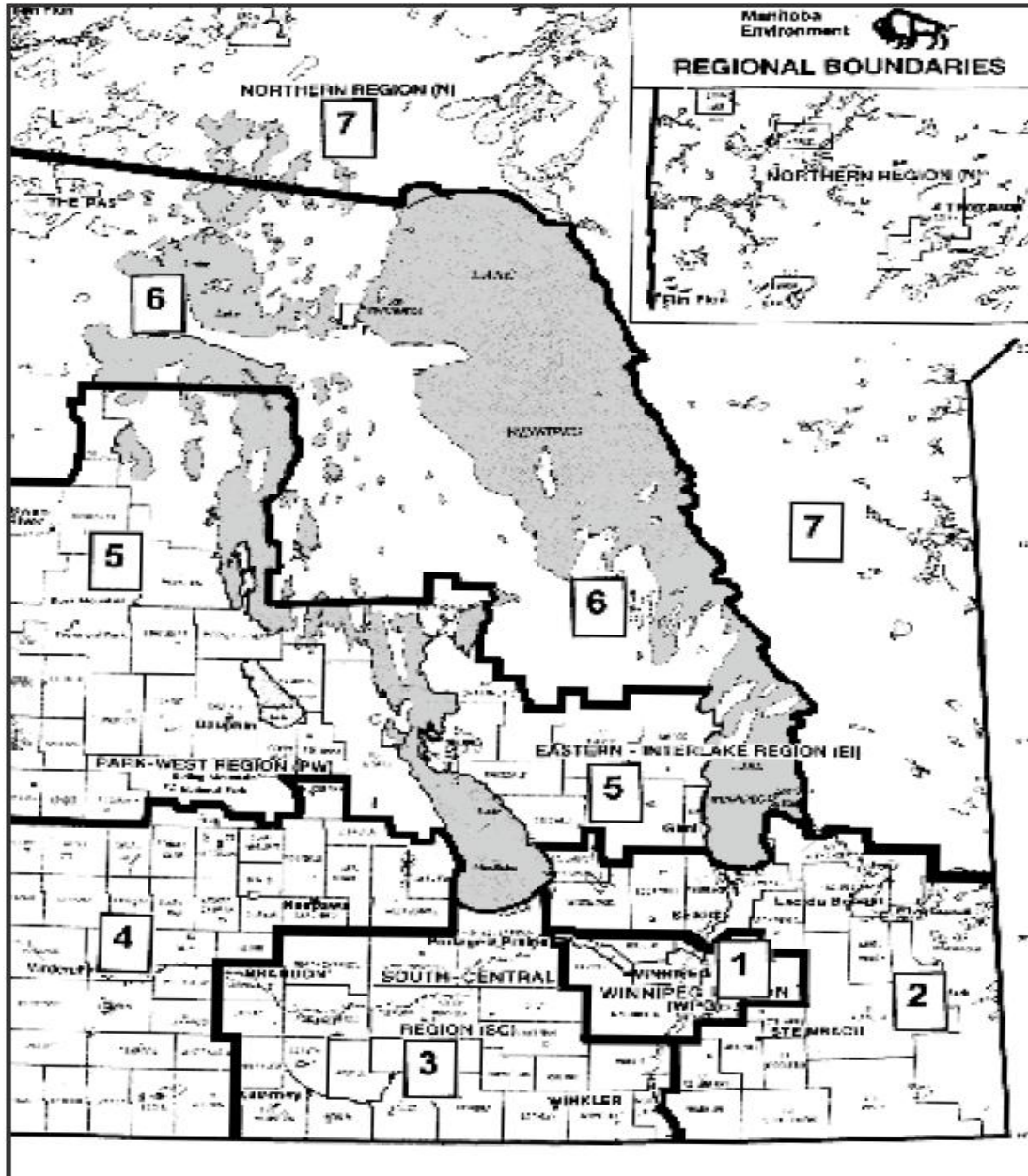
7.0 FINANCIAL MODEL – RECOVERY RATES BY ZONE

MANITOBA – 7 zones

USED OIL PRODUCTS RECOVERY RATES

2009 COLLECTION PERCENTAGE BY ZONE

ZONE →	1	2	3	4	5	6	7
Oil	61	8	15	4	5	1	6
Containers	38	12	19	10	12	1	8



7.0 FINANCIAL MODEL

7.2 Projected RI Expenses (\$)

Fluid / Bulk

Sales Volume 5,080,000 litres

Less 55%
Lost in Service 2,795,000

Net Collectable 2,285,000

Target → **Year 1** 18% 412,000

Zone 1
RI Rate 61% 251,000
x\$.30 75,370

Zone 2
RI Rate 8% 32,960
x\$.38 12,525

Zone 3
RI Rate 15% 61,800
x\$.38 23,485

Zone 4
RI Rate 4% 16,480
x\$.40 6,590

Zone 5
RI Rate 5% 20,600
x\$.42 8,650

Zone 6
RI Rate 1% 4,120
x\$.45 1,855

Zone 7
RI Rate 6% 24,720
x\$.55 13,895

142,020

7.0 FINANCIAL MODEL

7.2 Projected RI Expenses Year 1 to Year 5 (\$)

FLUID / BULK

		Year 1	Year 2	Year 3	Year 4	Year 5
Target Volume →		18% 412,000	23% 525,780	28% 640,000	33% 755,000	40% 915,000
Zone 1	X61% X\$.30	75,370	96,258	117,120	138,165	167,445
Zone 2	X8% X\$.38	12,525	15,990	19,455	22,952	27,813
Zone 3	X15% X\$.38	23,485	29,980	36,480	43,035	52,155
Zone 4	X4% X\$.40	6,590	8,416	10,240	12,080	14,640
Zone 5	X5% X\$.42	8,650	11,046	13,440	15,855	19,215
Zone 6	X1% X\$.45	1,855	2,367	2,880	31,398	4,117
Zone 7	X6% X\$.55	13,595	17,356	21,120	24,915	30,195
TOTAL	100%	142,020	181,415	220,735	288,400	315,580

7.0 FINANCIAL MODEL

7.2 Projected RI Expenses Year 1 to Year 5 – Containers (\$)

VOLUME Estimate Collectable 330,000 Kgs

		Year 1	Year 2	Year 3	Year 4	Year 5
TARGET		(15%) 49,500	(20%) 66,000	(25%) 82,500	(30%) 99,000	(35%) 115,500
Zone 1	X38% X\$1.69	31,790	42,385	52,980	63,580	74,170
Zone 2	X12% X\$1.80	10,690	14,255	17,820	21,385	24,950
Zone 3	X19% X\$1.80	16,930	22,570	28,215	33,860	39,500
Zone 4	X10% X\$1.85	9,160	12,210	15,265	18,315	21,375
Zone 5	X12% \$1.90	11,290	15,050	18,810	22,570	26,335
Zone 6	X1% X\$1.95	970	1,290	1,610	1,930	2,250
Zone 7	X8% X\$2.10	8,315	11,090	13,600	16,630	19,405
TOTAL		89,145	118,850	148,300	178,270	207,985

7.0 FINANCIAL MODEL

7.3 Cash Flow Projections Year 1 to Year 5 (\$)

	Year 1	Year 2	Year 3	Year 4	Year 5
Revenue EHC	751,800	751,800	751,800	751,800	751,800
Expenses					
Return Incentive (RI)					
Fluid	142,020	181,415	220,735	288,400	315,580
Container	89,145	118,850	148,300	178,270	207,985
Communications (1)	150,000	125,000	125,000	125,000	125,000
Management/ Administration (2)	100,000	110,000	120,000	125,000	130,000
TOTAL	481,165	535,265	614,035	716,670	778,565
NET	270,635	216,535	137,765	35,130	(26,765)
CUMULATIVE	-	487,170	624,935	660,065	633,300

7.0 FINANCIAL MODEL

7.3 5 YEAR PROJECTIONS – FOOTNOTES

- (1)** Communications are recorded in comparison to the Used Oil Program amounts – 2009 Actual \$139K

- (2)** Management and Administration costs are factored as time allotted for the Antifreeze entity to run separate to the used oil program

8.0 IMPLEMENTATION / ACCOUNTABILITY

Implementation:

The following action would take place between the Stewardship Plan Approval and the start-up date of April 1, 2011.

- ◆ MARRC By-Law #1 would be amended to include the Antifreeze Products
- ◆ The Director complement, currently at 6, would be increased by accommodating the addition of one Director from the Antifreeze industry
- ◆ The Members would be advised of the Plan Approval with the effective commencement date and copies of separate EHC remittance forms for Antifreeze.
- ◆ The MARRC Membership Agreement would be amended to accommodate the addition of Antifreeze.
- ◆ The MARRC Collector Manual would be amended accordingly.
- ◆ Manitoba Conservation would be requested to amend the EcoCentre Depot licenses approving the acceptance of Antifreeze at the facilities.
- ◆ The Financial Statements would be modified through PricewaterhouseCoopers to reflect the combined operation of the Used Oil Products and Antifreeze Stewardship Programs, with Revenue and Expenses associated with Antifreeze identified by separate codes for accountability purposes.

Accountability:

As required within the Regulation, and as in place with the Used Oil Stewardship Program, MARRC will be providing its Annual Report yearly within the deadline required of March 31 each year.

The Annual Report would include the following:

- ◆ Audited Financial Statements by PricewaterhouseCoopers
- ◆ Volume performance results, measured to targets
- ◆ Communication activities

9.0 BENEFITS OF THE STEWARDSHIP PROGRAM

- ◆ Promotes and facilitates the recovery of valuable resources
- ◆ Protects the environment by diverting materials from landfills and from inappropriate destinations such as fields, ditches and water courses
- ◆ Provides a single, comprehensive, cost-effective, sustainable and province-wide program which will be in harmony with programs elsewhere in Canada
- ◆ Creates new business opportunities

10.0 RECOMMENDATION

MARRC recommends approval of the 5 year Stewardship Business Plan for Antifreeze as proposed in this document.