

Summary of Consultation Comments

Vehicle Dismantling and Recycling Industry Code of Practice Intentions Paper

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Environmental Management Branch
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Table of Contents

Summary of Consultation Comments – Vehicle Dismantling and Recycling Industry Code of Practice Intentions Paper

Section A: Background to the Consultation Process and Responses Received	1
Introduction and Background to the Consultation Process	1
Description of Responses Received.....	1
Section B: Comments on Discussion Issues	2
Discussion Issue 1: Interpretation and application (of the code of practice)	2
Discussion Issue 2: Environmental Management System (EMS) plan.....	3
Discussion Issue 3: Materials to be addressed in an EMS plan	4
Discussion Issue 4: Plan registration and term	5
Discussion Issue 5: Monitoring and reporting EMS plans.....	6
Discussion Issue 6: EMS plan review and revision	7
Discussion Issue 7: Protection of human health and the environment.....	8
Appendix 1: Common Acronyms and Abbreviations Used in Submissions and this Summary... 	10

Section A: Background to the Consultation Process and Responses Received

Introduction and Background to the Consultation Process

This report provides a thematic summary of comments received as part of the consultation process for a “code of practice” (minister’s regulation) for the vehicle dismantling and recycling industry under provisions of the *Environmental Management Act* (EMA) and the *Waste Discharge Regulation* (WDR). The EMA and WDR were brought into force in July 2004. Under the legislation, introductions of waste from identified “prescribed” industries, trades, businesses, operations and activities require authorization (e.g., permit or approval) from the ministry. The WDR also contains provisions for establishing codes of practice issued by the minister as a form of authorization for specified industries, trades, businesses, operations and activities. A code of practice is a legally binding and enforceable set of rules that must be followed – the environmental protection measures and other actions that are expected of the industry by the ministry.

An “intentions paper” and response form were posted for public review and comment on the ministry’s website (www.env.gov.bc.ca/epdiv/ema_codes_of_practice/index) through November and December 2005. The intentions paper provided a summary of the ministry’s mandate and objectives, background information and potential environmental concerns arising from vehicle dismantling and recycling, the proposed contents of the code of practice, and the avenues for providing comment as the code is developed and implemented by the ministry. The response form set out discussion issues and questions in relation to the ministry’s intentions.

This document has been prepared for the Ministry of Environment by C. Rankin & Associates, contracted by the ministry to independently receive, compile and review comment on the proposed code of practice. The summary does not reflect the ministry’s position on any issue. It provides a synopsis of the responses that are being reviewed by the Ministry in the development of the code of practice – without specific attribution, except to the extent required to provide context for the comments. The summary follows the headings and questions contained in the ministry intentions paper and response form – with synoptic and detailed sections, as well as general, process related and supplementary comments from respondents. Section B of the document outlines general concerns and comments regarding the consultation process. Appendix 1 lists acronyms and abbreviations commonly used in submissions and this summary document.

All detailed comments have not been included in this document – but have been compiled as part of the comprehensive documentation of responses being reviewed by the ministry. All comments and references submitted through this process, through independent submissions and through direct consultations with stakeholders, will be reviewed and carefully considered by the ministry in the development of proposed code of practice.

Description of Responses Received

Over 30 responses were received (by e-mail, fax and attached file) by mid-January 2006 and have been reviewed for this thematic summary of comments. Most respondents who provided background (contact) information were involved in the industry (e.g., auto wrecking, auto parts, steel recycling, environmental services). Other submissions were received from representatives of federal, regional and local government agencies, and First Nations.

Section B: Comments on Discussion Issues

This section contains a detailed summary of responses to questions posed in the response form. This summary reflects the range of comments received, as well as excerpts of individual submissions with specific advice or recommendations. Direct excerpts from submissions are included in quotation marks (“ ”) and square brackets ([]) indicate inferred or contextual terms. The complete set of responses and submissions received through the consultation process has also been compiled and passed to the ministry for detailed review and consideration.

Discussion Issue 1: Interpretation and application (of the code of practice)

The Ministry is proposing that the code of practice apply to auto salvage and holding yards and businesses that may receive, dismantle, recycle and/or reuse used automobiles as defined in the *Waste Discharge Regulation*.

Question 1.1: Do you feel that the code of practice should apply to: salvage & holding yards; automotive dismantlers & recyclers; and/or scrap metal recyclers?

Most respondents who commented on this topic noted that any code or regulation for the protection of the environment should apply equally to all who handle salvage (or “end of life”) vehicles. Respondents, for example, felt that “the management of hazardous materials from the accident or abandonment site to the steel recyclers is appropriate” and “we are all part of the problem, we should all be part of the solution – I would like to see the manufacturers and the insurance companies involved as well, even the owners”. One respondent, in contrast however, felt that “this should be left up to us, we can look after ourselves, don’t need any more government in our lives”.

Several respondents offered specific comments on the scope of businesses that should be covered by the code of practice. One respondent felt that “collision repair or body shops that purchase salvage from ICBC or other insurance companies, or any purchaser of salvage must be included with auto dismantlers and steel recyclers... they purchase these end-of-life vehicles for the specific purpose of dismantling them for parts”. With respect to scrap metal recyclers, one respondent commented that “we [the Canadian Association of Recycling Industries] support the concept of environmentally managing all of our purchased materials in a sound manner... however, there needs to be an understanding of the fundamental differences between our sector and that of the auto wreckers and an elimination of any duplication of effort”. Other related comments included: “scrap metal recyclers should not be grouped in with auto recyclers”; and “[make a] distinction between scrap metal recyclers that only purchase vehicles from auto dismantlers and scrap metal recyclers that purchase whole vehicles to de-pollute”.

One respondent requested clarification regarding the ministry’s intention and legal ability to address salvage and holding yards under the definition of the “vehicle dismantling and recycling industry” in the *Waste Discharge Regulation*. The respondent expressed “serious concerns” with the potential inclusion of salvage and holding yards in the proposed code of practice, noting that many of these businesses “are small operators of limited economic means”. In contrast, other respondents commented that, for example, “if these businesses are involved in processes such that there is a potential for a release of a harmful substance, then yes the code of practice should apply to them”. Another commented that “there should be an even playing field” for businesses dealing with end of life vehicles and that costs for waste management are often “passed on to salvagers” – and encouraged the ministry to “ensure fairness and value [in the] recovery process”.

Question 1.2: Are there any aspects of vehicle dismantling and recycling that should not, in your view, be covered under the code?

Several respondents suggested that any regulatory requirements for vehicle storage facilities should focus on preventing the loss of harmful substances (and would not need to be as complex as for other businesses involved vehicle dismantling and recycling). Comments were made that retail parts sales and aspects of the recycling business that are already covered by WorkSafeBC (the Workers' Compensation Board) should not require additional regulation under a separate code of practice. One respondent suggested that "in view of the fact that automotive batteries and tires are subject to product stewardship... covering these materials under the code would seem unnecessary." Respondents also questioned the intent of the ministry in addressing "backyard" or "one man" operations – "the code needs to make clear who is captured and who is not, and even if the code captures certain individuals, they may be exempt[ed] from certain sections...traditionally we have relied on Regional District and City Bylaws [rather than provincial legislation]". A respondent commented that any code (or environmental management system or plan) should not encumber businesses with the expense of hiring an "independent third party" or additional registration fees but rather provide "reasonable guidance and info on what to do".

Discussion Issue 2: Environmental Management System (EMS) plan

The proposed code would require every vehicle dismantler and recycler to have a current "Environmental Management System (EMS) plan" – or belong to an association that has such a plan – and to comply with the contents of the plan.

Question 2.1: What comments or suggestions do you have regarding environmental concerns that should be addressed in any EMS plan that may be prepared by a business in the vehicle dismantling industry?

Almost all respondents who commented on this question were in favour of the use of environmental management system (EMS) plans as an appropriate means for the vehicle dismantling industry to follow environmental protection regulations. Several advised that any EMS must provide a framework that is pertinent, simple and cost-effective for small businesses to understand and apply, and as one respondent commented, "not be too prescriptive, allowing flexibility for the wide range of issues that confront this widely varied industry". One respondent further cautioned that "small businesses are fed up...we can't afford you to be in our lives...and you want us to spend more money that we don't have".

Several respondents provided comment or asked questions regarding the roles of the ministry, industry associations and "qualified persons" in preparing and/or monitoring EMS plans. These included: "Does this mean the ministry will not be reviewing any of the plans? What happens if the plans are poor or have major omissions? Does [the ministry] only follow up on audits? Can [the ministry] make people re-write their plans?" One respondent recommended that the EMS planning process "should be run by the province, no[t] associations" while another, in contrast, commented that "we have been certified to AREA's EMS plan for three years and find it clear, comprehensive and easy to follow".

One respondent pointed out that "many automotive dismantling and recycling facilities are operated on leased lands [and] as such, the MOE should consider addressing responsibility (i.e., land owner versus facility operator) for adherence to the code of practice, and for insituting capital improvements required by the COP (e.g., installing secondary containment, oil/water separators)".

Many specific suggestions were provided in response to this question. These included:

- "The plan should also include emergency spill response and fire procedures";
- "List the [contact information and names] of companies that will be used to dispose of hazardous

material”;

- Oil/waste oil containment with secondary containment”;
- “Classification description [system based on size >5, 10, 15, 20 vehicles processed], facility design, spill protocol, collection procedures, parts cleaning, waste water reuse”;
- “Capacity levels so [that] all vehicles are handled properly [i.e., within the capacity of the facility to handle in an environmentally safe manner]”;
- “The MOE should consider establishing baseline environmental performance criteria (beyond simply referencing general compliance with existing legislation)”;
- “The definition of ‘management practices’ [should] include structural aspects of the facility as described in Environmental Protection for the Automobile Recycling Industry in British Columbia...defined as ‘approved practices, maintenance procedures, and other physical, structural, and/or managerial practices to prevent the contamination of the environment’ (this definition will obligate the facility to have its dismantling area under a roof and within a containment area...prevent[ing] contamination of storm water runoff from the facility)”;
- “The potential release of ODSs (ozone depleting substances) from vehicles”;
- “[Reference to] other [recycling] programs [beyond those managed by the ministry]...such as the used oil products and the program to address solvents and paints”;
- “Insurance companies throughout BC should remove and dispose of harmful contaminants long before they arrive in the auto dismantling yards...most of the time the vehicle sits in an insurance company’s holding yard for long periods at a time leaking hazardous material from the vehicles while sitting waiting to be sold off to the recyclers for dismantling purposes”; and
- “By subjecting the materials of concern, such as anti-freeze and ozone-depleting substances, to product stewardship legislation, the environmental risks associated with these products can be minimized or eliminated and the need to address them through an EMS lessened”.

Question 2.2: Do you feel that an ISO standard (e.g., 14000 or 14001) would be appropriate for use in the vehicle dismantling and recycling industry?

Responses to this question were divided but generally sceptical of the use of ISO standards in this situation. Many respondents commented that the ISO standards and certification are targeted to larger industries and “too expensive [or too administratively onerous] for small businesses” to obtain and follow. Some suggested that components of the ISO standards (such as objectives and programmes, emergency response planning, management review, monitoring and “continuous improvement”) could or should be part of an EMS plan, and/or that ISO standards could “be used as a benchmark” for the vehicle dismantling industry. One respondent pointed to the Institute of Scrap Recycling Industries (ISRI) program “that incorporates a number of ISO based standards into one specifically for scrap metal recyclers” as a potential source of information for the vehicle dismantling industry.

Discussion Issue 3: Materials to be addressed in an EMS plan

The EMS plan would have to address the management of identified materials with potential to harm human health or the environment during the receiving, removal, storage, transportation and disposal of end-of-life vehicles and their parts. A proposed list of materials that must be addressed in the EMS plan is included in the intentions paper. These materials include hydrocarbons (e.g., oils, brake fluids, propane), ozone depleting substances, anti-freeze, lead and lead acid batteries, used tires and mercury switches.

Question 3.1: Do you feel that the proposed list of materials identified for consideration in an EMS plan is appropriate and complete? Do you have any suggested changes to the list of materials?

In the view of most respondents who commented on this question, the proposed list of materials was appropriate. Several respondents suggested that vehicles may contain additional “new materials” (such as plastics and carbon fibre composites) that will have to be addressed by the industry and any code of practice. One suggested that “there is an opportunity to require the scrap vehicle management industry to recycle materials such as plastics”. Another respondent pointed out that “cost effective centres that collect the... materials [must be] available for collecting and disposal”.

Additional suggested materials of concern or interest for management or recycling included air bags and air bag propellants, oil filters, wheel balancing weights (lead), LCD monitors, DVD players, Styrofoam, glass, non-hazardous wastes (e.g., cardboard, paper), and natural gas. One respondent recommended that pressure washer sludge “should be covered [as] this is toxic and should be monitored”. One respondent questioned the inclusion of windshield washer fluid within the proposed code, commenting that “this product is designed and sold for the purpose of being discarded on the streets and highways – the manufacturers should therefore ensure [that] their product is biodegradable and safe for disposal into soils and subsequent migration into our rivers and lakes and oceans.

Discussion Issue 4: Plan registration and term

The intentions paper describes a proposed process for registering an EMS plan, involving either individual vehicle dismantlers or an association acting on behalf of more than one establishment

Vehicle dismantlers and recyclers would be required under the proposed code to register with the director and pay a fee for registration of an EMS plan, with a plan having a term of up to five years.

Question 4.1: Do you have any comments regarding the ministry’s proposed intention that an association be able to register an EMS plan on behalf of more than one business?

Most respondents who answered this question supported the ministry’s proposed intention, stating, for example, that “if the business belongs to an association that promotes the environmental standards that you [the ministry] want, an association should be allowed to file”. A few respondents expressed concern that allowing associations to register on behalf of members may give the association “too much power” and that the ministry needs to have the means to ensure that all businesses are complying with the EMS plan under which they are registered, as well as addressing responsibility for situations where the ministry findings differ from reported actions. While only a few respondents felt that each “auto dismantler and wet or contaminated vehicle receiver should have their own plan registered directly with the ministry, a common thread among responses was that “each business should [be] aware of the responsibilities and duties to comply with [the registered EMS plan and] reports and monitoring”.

One respondent raised a number of questions for the ministry to consider if “an association pays a ‘collective fee’ on behalf of its members... What happens if the association fails to pay that fee? Do all the members lose their registration or do they have other options? If it is the association that prepares the plan and pays the fee, is it the association that registers on behalf of its members? Or does each individual person register though they are part of the association? Is there one registration number or many?”

Question 4.2: Do you feel that the proposed term for an EMS plan of up to five years is appropriate? Do you have any suggestions or comments regarding the proposed term?

Respondents were divided in their comments on this question, however, most suggested that a five year would “seem to be too long... given the dynamic nature of the waste management industry”. Respondents commonly recommended a two or three year term for an EMS plan, with an initial annual inspection or audit and less frequent inspections if sites are found to be in compliance.

Discussion Issue 5: Monitoring and reporting EMS plans

The proposed code of practice includes requirements for vehicle dismantlers and recyclers operating under an individual EMS plan to have an “independent third party” conduct a review of their operation in relation to the EMS plan, and to post the results of the review, every two years. An association that has prepared an EMS plan on behalf of more than one vehicle dismantler and recycler would be required to publish a report every year that includes the number of members of the association who were audited for compliance with their EMS plan and results of those audits.

Question 5.1: Do you feel that the proposed process for monitoring and reporting compliance with EMS plans supports ministry objectives to prevent pollution, support waste reduction, foster environmental stewardship and ensure compliance with regulations? Do you have any suggestions for improving the monitoring and reporting process?

Many respondents echoed comments made in response to question 4.2 – that monitoring of businesses should be undertaken on an annual or biannual basis, with less frequent assessments if the business has a history of being in compliance with the EMS plan (similar to current practice under, for example, the City of Abbotsford business inspection and compliance program). Individual respondents provided a variety of specific (and potentially conflicting) advice for the ministry:

- “Stay out of our lives – you pencil pushers just try to make jobs for your[selves]”;
- “Don’t sit in the office and make up rules and regulations, visit every yard that this will effect”;
- “I feel that the MOE should come around and check out the businesses at no cost to the business. If we conform, you give us \$100 for being good guys. If not you make it very plain why we don’t conform and exactly what we need to do to conform and assist us to accomplish this goal – financially if needed. No independent third party”;
- “Let the government fairly monitor, you can’t let the associations run themselves, its like letting drug dealers run the police”; and
- “Make it and keep it simple, people in this business are trying to make a living as well as helping to clean up the environment”.

Respondents also had specific (and varying) recommendations with respect to reporting. For example: “I would like to see a list of all dismantlers posted”; associations should only be posting their report every two years”; and “online self reporting plus random (at least quarterly) inspections by a third party”.

Question 5.2: Do you feel that the proposed process for monitoring and reporting compliance with EMS plans for individual vehicle dismantling and recycling businesses is clear and appropriate? Do you have any suggestions for improving the monitoring and reporting process?

Several respondents suggested the focus of the proposed code of practice at the level of the individual vehicle recycling business may be misplaced. For example, one respondent commented that “if mercury switches are a problem” then the attention should on manufacturers to eliminate use of mercury switches.

Another respondent noted that “most vehicles have already leaked out fluids before a towing/recycler/dismantler gets them”. Specific comments regarding reporting included:

- “The complete findings (the detailed inspection reports) should be published, not just a summary of the results”;
- “No public disclosure, this can be highly confidential/competitive information”;
- “Currently scores for AREA certification are made public – this allows people to see how their business performed in relation to the rest of the industry”; and
- “Inspection details should be published to evaluate the truthfulness of their statements”.

One respondent from municipal government suggested that local governments should be notified if businesses are found to be out of compliance with the code of practice. Another respondent commented that “I feel that the smaller businesses are being penalized if they do not belong to an association – they should be able to review and report on their EMS plan themselves”. The respondent recommended that Ministry of Environment personnel should “be available” and “hold EMS training sessions to educate businesses on how to conduct them – this would give the businesses a feeling of ownership and pride in their improvement”.

Question 5.3: Do you feel that the provisions for an association that has prepared an EMS plan to monitor and report compliance results are clear and appropriate? Do you have any suggestions for improving the monitoring and reporting process?

Several respondents raised questions or requested clarification about the role of a “third party” in monitoring compliance, suggesting, for example, that “EMS plans for associations should be reviewed by Ministry of Environment personnel as well – MOE is the most appropriate body for monitoring business compliance”.

Discussion Issue 6: EMS plan review and revision

Under the proposed code of practice, a vehicle dismantler and recycler (or association) who has prepared an EMS plan would be required to update the plan regularly, review and revise the plan every 5 years, and post any revised plan(s) and required reviews for review by authorized officers and the public.

Question 6.1: Do you feel that the proposed review and revision provisions for an EMS plan are clear and appropriate? Do you have any comments or suggestions for improvement?

In line with responses to questions 4.2 and 5.1, respondents commonly suggested that a five year term for an EMS plan would be “too long” and a two or three year term would be more appropriate. One respondent suggested that the ministry institute “some mechanism to trigger a letter from BC MOE to ensure the new EMS is developed... [as] most small businesses will find it difficult to track irregular events requiring action”.

Question 6.2: Do you feel that it is reasonable and appropriate to require that EMS plans are posted to the internet in a manner that enables review by an authorized official or inspector, and viewing by the public? Why or why not?

Respondents were almost equally divided on this question. Comments in support of public posting included: “plans posted to the internet would give everyone the perception of truthfulness or transparency”; “because the public should be aware of a company’s environmental practice”; “as long as they do not disclose any information about company plans/business to competitors” and “transparency is import-

ant”. Respondents raising concerns about public posting cited concerns with the *Privacy Act*, a feeling that “the general public [may not] translate the laws in an appropriate manner to make a correct review” and questions about whether public posting would “help to achieve the goals of the plan”. Those respondents who expressed concerns about public posting, however, generally commented that they would support authorized officials or inspectors undertaking monitoring and providing reports to the ministry and the involved business(es).

Discussion Issue 7: Protection of human health and the environment

Question 7.1: Are there any aspects of vehicle dismantling that could significantly affect human health or the environment that are not, in your view, sufficiently addressed in the proposed code? What are they? What suggestions do you have for the ministry to improve the manner in which these concerns are addressed?

Almost all respondents felt that the proposed code of practice would sufficiently address protection of human health and the environment. Several pointed to comments made in response to question 3.1 (materials subject to the code of practice) for suggested improvements. Additional suggestions included:

- “Vehicle dismantling should only be done by trained vehicle dismantlers”;
- “I am unsure whether the presence of PCBs in older vehicles has been researched and addressed”;
- “Airbags, fuel cell vehicles”;
- “Pay tire collection fee to collection yards”;
- “I don’t see any solutions to the problems – e.g., do you have a pamphlet pointing out every location of mercury switches? Do you have tire collection at all locations?”; and
- “There is an opportunity to require the scrap vehicle management industry to recycle materials such as plastics, which represent an ever increasing proportion of a typical automobile”.

Question 7.2: Do you have any other comments or suggestions for the ministry?

Many of the responses included additional comments. Several respondents expressed concern that the proposed code of practice might increase the cost of vehicle recycling, limiting business (and waste reduction) opportunities for the recycling of end of life vehicles and collection and disposal of derelict vehicles. For example, one respondent cautioned that “this EMS MUST NOT burden the businesses to the point of lost jobs and businesses – the province, industry and A.R.A. must work together as partners to make sure the plan works”.

A number of respondents commented on the need to look beyond the vehicle recycling industry to reduce use of environmentally damaging materials in vehicles, reduce waste and encourage recycling. Several suggestions were made on programs or fees to support recycling of end-of-life vehicles. Comments included: “stop passing the buck and stop making it so easy to buy disposable...it is up to everyone to solve the pollution problem”; “people and companies making the effort clean up and recycle should be paid for it”; “implement advanced disposal fee on yearly insurance premiums to assist auto recyclers with processing costs of end-of-life vehicles”; “an industry stewardship program should also be considered – a disposal fee could be applied to new purchases and put towards the end use activities”; and “when new cars are sold, a fee for handling environmental pollutants [should be instituted] to be used for end of vehicle life [dismantling and recycling]”. Respondents also commented that “incentives are needed to keep solid waste from landfill” and that “the code needs to take into consideration current landfill activities and how vehicles should be managed at municipal landfills”.

One respondent pointed to the best management practices (BMP) document adopted by AREA that “included both operational and design aspects of handling end of life vehicles... the intentions paper seems to be ignoring the design side of our industry’s BMP, of which it is part and parcel – without it our BMP is ineffective, for example, without a covered and contained dismantling pad for use in processing vehicles, preventing the release or escape of hazardous materials into the environment cannot be guaranteed – the ministry must ensure all aspects of our BMP is incorporated into the Code of Practice”.

Several suggestions were made to the ministry with respect to clarifying definitions. Respondents recommended revising the definition for vehicle “since a ‘vehicle’ deregistered by ICBC is no longer defined as a ‘vehicle’... the term ‘irreparable vehicle’ or ‘end-of-life vehicle’ should be used”. One respondent also suggested that the ministry “revise the definition for recycling/dismantling”.

One respondent provided a detailed set of comments clarifying categories within the recycling industry and issues for ministry consideration in any further development of the code of practice. These comments are included below:

“1. Processors vs. Collectors:

- a. Processors/shredders – convert raw material into finished product. There are two in the Province of British Columbia (Budget Steel, Victoria and Richmond Steel, Richmond)
- b. Collectors – there are many, some who send cars to processors in BC and some who send to processors in other jurisdictions.

2. Origin and Destination:

- a. Export – scrap cars that originate in British Columbia may be processed into finished scrap in British Columbia or shipped elsewhere for shredding. Other jurisdictions do not have such a code of practice so unprocessed cars may be shipped out of BC.
- b. Import – scrap cars from other jurisdictions are coming into British Columbia to be processed by the shredders located in British Columbia. These jurisdictions do not have a code of practice similar to the proposed BC plan.

3. Fees and costs:

- a. Car Manufacturers – in almost all other jurisdictions, car manufacturers are being forced to take responsibility for the vehicle end of life program.
- b. To process the cars properly will cost a certain amount of money. Nowhere in the code of practice is this addressed. A fee needs to be charged at the point of purchase and put into a trust account to pay for the cost of de-polluting cars when they are ready for recycling.

4. Wet cars vs. dry cars:

- a. Wet cars – these are cars that have been not been de-polluted before they are shipped to a car processing facility.
- b. Dry cars / processed cars – these cars have had the contaminants removed from them before they are shipped to a shredder.

5. De-polluting at scrap yards: some recycling operations have the ability to de-pollute cars while others are not set up presently do handle wet cars.

6. Auto wreckers: remove parts to sell and de-pollute vehicles, then sell the auto hulks once they are done with them to scrap metal recyclers.”

Appendix 1: Common Acronyms and Abbreviations Used in Submissions and this Summary

Acronym/Abbreviation	Term
ARA	Automotive Recyclers' Association
AREA	Automotive Recyclers' Environmental Association
BC	British Columbia
BMPs	Best Management Practices
CARI	Canadian Association of Recycling Industries
COP	code of practice
CSR	<i>Contaminated Sites Regulation</i>
EMA	<i>Environmental Management Act</i>
EMS	Environmental Management System (plan)
ICBC	Insurance Corporation of British Columbia
ISO	International Standards Organization
ISRI	Institute of Scrap Recycling Industries
m	metre
m ³	cubic metre
MOE	Ministry of Environment
ODSs	Ozone depleting substances
PCBs	Polychlorinated Biphenyls
T	Tonne
WDR	<i>Waste Discharge Regulation</i>