



January 23, 2020

To all UOMA NL Members

REMINDER: Used Oil and Glycol Regulation in Newfoundland and Labrador – Passing on of Costs

As you are aware, an Environmental Handling Charge (EHCs) for Used Oil and Glycol products have been introduced in Newfoundland and Labrador effective October 1, 2019.

It has come to our attention that some brand owners, wholesalers/distributors, and retailers of oil and glycol products in Newfoundland and Labrador may be charging/showing the Environmental Handling Charge (EHC) as a separate line item on their billing/invoicing.

The amended Newfoundland and Labrador Waste Management Regulations, Part VI, 31.48 states that: *“a brand owner shall not charge a retailer and a retailer shall not charge a consumer a separate fee with respect to the cost associated with implementing or operating an oil and glycol stewardship plan or carrying out the brand owner’s duties under this Part.”*

A copy of the regulations is available at <https://www.assembly.nl.ca/Legislation/sr/Regulations/rc030059.htm>.

Following a review, the spirit and intent of the regulations remain that brand owners, wholesalers and retailers shall not charge or show the EHCs separately on billing/invoicing when passing on the costs. EHCs are intended to be part of the product price.

UOMA – Atlantic is pleased to be a partner with the MMSB and the province of Newfoundland and Labrador, and look forward to strengthening the recycling and waste services for businesses, residents and communities throughout the province.

Regards,

Jean Duchesneau
General Manager