

**Product Care Association**

**Public Consultation Meetings – 2006 Program Plan Refiling**

**Issues Summary**

<b><u>Issue Raised</u></b>	<b><u>Product Care Response</u></b>
<p><b>Program Performance:</b> How will program performance be effectively measured, what are the appropriate recovery rates and targets?</p>	<p>The challenge with the products in the Product Care program is that they are consumable products and it is very difficult to know what the ‘available for collection’ amount is. In the consultation process, Product Care identified and analyzed a number of possible performance measures. The most frequent suggestions made in the consultation responses were to measure consumer awareness, recovery rates and waste audit results. Product Care commits to conducting consumer surveys, continuing and refining recovery rate data, and participating in waste audits. With respect to waste audits, consideration must be given to ways to improve this statistical significance for the relatively small HHW component.</p>
<p><b>Municipal Collection Role:</b> It is generally recognized that participating local governments are reasonably compensated with respect to permanent Product Care depots, however this may not be the case with collection events.</p>	<p>Product Care considers the permanent depot system to provide the greatest accessibility (typically year round, 6 days a week) and the greatest efficiency. However Product Care participated in 14 one day collection events in 10 municipalities in 2006. Typically for these collection events Product Care will supply collections bins, staffing and removal of the collected Product Care program materials. Product Care is prepared to discuss other cost sharing formats, but considers the current cost sharing system to be reasonable.</p>
<p><b>Empty containers:</b> It is recognized that Product Care manages ‘already empty’ paint containers, but it should also handle already empty paint containers for the other Product Care program products.</p>	<p>Product Care is prepared to meet its regulatory obligations with respect to already empty containers, however this obligation has not been clear from the regulation wording. In addition Product Care notes that the recycling options for many containers such as pesticides are limited or non-existent. Product Care will continue communications with the regulatory authorities in this regard.</p>

<p><b>Empty paint cans in blue box:</b> Some municipalities are very interested in managing empty paint containers in the Blue Box program, subject to receiving compensation, others are not interested due to the perceived risk that the containers will not in fact be empty and will cause damage.</p>	<p>It is noteworthy that 3.7 million Ontario households (80% of households in Ontario with blue box service) are able to place already empty paint containers in the blue box, without incident. Similarly 3 million households accept empty aerosol cans. Product Care looks forward to conducting a pilot program with an interested municipality, and expects to compensate the municipality for the cost of managing program product containers.</p>
<p><b>More collection points for HHW:</b> The number of paint collection facilities seems to be generally adequate, however there are not sufficient full program product collection facilities (“Paint Plus”).</p>	<p>Initially, the number of full scope Paint Plus facilities was negotiated between industry and the government, and the number was partly a reflection of the large, expensive ‘concrete bunker’ storage facilities required. Product Care has now developed a much less expensive modular steel ‘over bin’ which satisfies the requirements. Product Care is targeting the addition of 2 Paint Plus depots per year to the collection system.</p>
<p><b>Private sector collection</b> Additional collection capacities should be developed in the private sector, i.e. return to retail.</p>	<p>Product Care is committing in its plan to increase the number of depots, in particular paint plus depots. Product Care is prepared to work with any interested retailer. Some retailers provide this service in the Quebec Paint Stewardship Program, but none have made the same offer for British Columbia. There are issues regarding storage space, staff training etc. at retail sites.</p>
<p><b>A consumer survey</b> is needed to measure consumer awareness of the program, and other questions such as knowledge of depot locations</p>	<p>Product Care commits to conducting a consumer awareness survey and intends to include questions such as program awareness and distance to depot in the survey. Product Care commits to doing a second survey within the 5 year planning timeline, and will consider if an annual survey has value.</p>
<p><b>Program Costs/Promotion and Education-</b> The Product Care programs seem to be efficiently run, but additional resources should be committed to promotion and education such as broadcast and print advertising.</p>	<p>Product Care commits to increased promotion and education. Product Care is always concerned about targeting and cost effectiveness with promotion. An analysis performed for Product Care by a communications consultant does not recommend broadcast media because of the long interval between the times that consumer needs the service. The recommended promotion has to do with point of sale, point of return and ‘point of decision’. The program’s communications objective is to have program information available in the locations where a consumer is expected to look (e.g. on the</p>

	paint container, at the retailer, at the municipality, in the yellow pages, etc.)
<b>More HHW products should be added.</b> More HHW material should be added to the Product Care program such as antifreeze, agricultural pesticides, commercial paints, non paint aerosols, etc.	Product Cares program responds to the requirements of the recycling regulation. The addition of new products to the regulation is for the consideration of the Ministry of Environment.

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