

CESA

BC Product Stewardship Plan - Part 2: Phase 5 Products

(launch date July 1, 2012)

For more Information:

**Canadian Electrical Stewardship Association
c/oProduct Care Association**

12337 – 82A Avenue

Surrey, B.C.

V3W 0L5

604-592-2972 x218

contact@cesarecycling.ca

www.cesarecycling.ca

Draft Version: March 9, 2012

Table of Contents

1. Introduction – Program Expansion and Consultation Process	3
2. Stewardship Agency and Program Membership	3
3. Program Products	4
3.1 Power Tools	4
3.2 Textile Processing Machines	6
3.3 Sports/Leisure/Exercise Equipment & Arts/Crafts/Hobby Devices	6
4. Current Market and End of Life Management.....	7
5. Proposed Program Operations	7
5.1 Collection System.....	7
5.2 Processing and Tracking.....	8
5.3 Product Life Cycle and Pollution Prevention Hierarchy.....	8
5.4 Consumer Awareness	8
5.5 Program Administration	10
6. Performance Measures and Targets.....	10
6.1 Collection Rate	11
6.2 Consumer Awareness	11
6.3 Collection System and Accessibility	12
7. Stakeholder Consultations.....	12
Appendix A – Consultation Summary	14

1. Introduction – Program Expansion and Consultation Process

This document, entitled the **CESA BC Product Stewardship Plan –Part 2: Phase 5 Products**, has been developed by the Canadian Electrical Stewardship Association (CESA). The program plan has been developed pursuant to the requirements of Recycling Regulation B.C. Reg. 449/2004 (the “Regulation”) and deals with products listed in “phase 5” of s. 2.3 of schedule 3 of the Regulation.

CESA’s product stewardship program for portable and floor care appliances (small appliances), which launched on October 1, 2011, is now referred to as the CESA BC Product Stewardship Plan – Part 1: Phase 4 Products (“CESA Part I”). The CESA Part 1 plan was presented for consultation in October and November, 2009 and approved by the BC Ministry of Environment in July, 2010. That plan is available at www.cesarecycling.ca/documents.

On July 1, 2012, the CESA BC small appliances program will expand by adding new categories of program products including power tools, textile processing machines and exercise equipment.

Plan Designation	Products	Status	Launch date
CESA Part 1	Small appliances (Phase 4)	Approved	October 1, 2011
CESA Part 2	Power Tools etc. (Phase 5)	Consultation, plan to be submitted by October 1, 2011.	July 1, 2012

The intent of the program, as described in this draft plan, is to establish and operate a product stewardship program, including a collection system across BC. Collected products will be transported to appropriate facilities for recycling and other management options. The plan also includes a description of the communication efforts that will ensure awareness of the program and to inform consumers and commercial generators how to recycle their products through this program.

Upon approval of the program plan by the B.C. Ministry of the Environment, program plan implementation will begin, including:

- Registration of producers
- Budget development, cost analysis and fee setting
- Creation of the communication strategy
- Identification and qualification of collection sites, transporters and processors.

In many respects, CESA Part 1 and CESA Part 2 will be delivered as a combined program, capitalizing on available synergies.

2. Stewardship Agency and Program Membership

The Canadian Electrical Stewardship Association (CESA) is a national not for profit corporation created for the purpose of operating extended producer responsibility programs in Canada. CESA is governed by a Board of Directors representing the members of CESA who are the manufacturers/brand owners and retailers of products managed by the CESA program.

CESA is responsible for operating the stewardship program according to the stewardship plan on behalf of its members who are the producers of program products, as defined in the BC Recycling Regulation. In joining the CESA program, each producer appoints CESA as its agent to carry out the duties of the producer imposed by the Recycling Regulation, pursuant to section 2(2) of the Regulation.

Program members may include the manufacturers, brand owners, distributors, first importers and retailers of program products in BC. Program membership will be open to all obligated producers. For a list of current members of CESA, please visit www.cesarecycling.ca/member-list

3. Program Products

The CESA Part II will include certain categories of products listed in “phase 5” of s. 2.3 of schedule 3 of the Regulation. The term “program products” will be used in this plan to refer to the following product categories.

3.1 Power Tools

Power Tools		
BC Recycling Regulation Schedule 3 (excerpt)		
2.3(b) electronic or electrical tools, other than large-scale stationary industrial tools, including, without limitation,		
(i) drills, saws and welding and soldering tools,		
(ii) equipment for turning, milling, sanding, grinding, sawing, cutting, shearing, drilling, punching, folding, bending or otherwise processing wood, metal or other materials,		
(iii) tools for riveting, nailing or screwing or removing rivets, nails or screws,		
Program Product Definition		
Portable/mobile electronic or electrical tools with a power cord, plug and/or battery(ies). Program products include, but are not limited to, those used for bending, cutting, drilling, folding, grinding, milling, polishing, punching, sanding, sawing, shearing, soldering, turning, welding, or otherwise processing wood, metal or other materials, including battery powered hand tools. Program products also include those used for measuring and for nailing, riveting, screwing or removing nails, rivets or screws.		
Tools captured by this program can be classified into the following two categories:		
<ol style="list-style-type: none"> 1. Portable, Hand-Held Power Tools – Electronic or electrical tools, used for any of the above purposes, which are portable and designed to be held in the hand(s) of the operator when in use 2. Bench or Free Standing Power Tools – Electronic or electrical tools, used for any of the above purposes, which are portable/mobile and designed to be used on top of a work bench, table or floor 		
Tools that meet any of the definitions above are included in the program regardless of whether they are marketed for household, industrial or commercial purposes.		
Examples of Program Products		
Portable, Hand-Held Power Tools		
Cutting, Sawing and Trimming	Fastening and Joining	Measuring, Detection, Diagnostics
<ul style="list-style-type: none"> Angle Saw 	<ul style="list-style-type: none"> Autofeed Screwdriver 	

<ul style="list-style-type: none"> • Band Saw • Circular Saw • Diamond Corer/Cutter • Foam Rubber Cutter • Handsaw (powered) • Jigsaw • Nibbler • Reciprocating Saw • Shear Tool • Trimmer <p>Drilling and Demolition</p> <ul style="list-style-type: none"> • Breaker Hammer • Combi-Hammer • Demolition Hammer • Drill • Hammer Drill <p>Other Portable, Hand-Held</p> <ul style="list-style-type: none"> • Battery Recharger (for power tools) • Heat Gun • Inflation Gun • Power Painter • Solder/Unsolder Equipment • Spray Gun • Wallpaper Steamer 	<ul style="list-style-type: none"> • Biscuit Joiner/Plate Joiner • Caulk/Adhesive Gun • Glue Gun • Impact Driver • Impact Wrench • Metal Tapper • Nailer (flooring, framing etc.) • Pex Expander • Ratchet • Screwdriver • Shear Wrench • Stapler (finishing etc.) <p>Polishing, Sanding, Grinding</p> <ul style="list-style-type: none"> • Angle Grinder • Die Grinder • Polisher/Disc Sander • Sander (belt, finishing, orbit, sheet etc.) • Tuckpoint Grinder • Waxer <p>Scraping and Shaping</p> <ul style="list-style-type: none"> • Chisel • Planer • Power Scraper • Router 	<ul style="list-style-type: none"> • Clamp Meter • Combustion Analyzer • Detection Tool • Digital Multimeter • Electrical Tester • Ferrodetecter • Fork Meter • Laser Level • Laser Measuring Device • Laser Range Meter • Leak and Pressure Detector • Measuring Tape (powered) • Plum Laser • Point Laser • Probes and Thermocouples • Rotating Laser • Stud Finder • Temperature/Humidity Tester • Transpointer <p>Automotive</p> <ul style="list-style-type: none"> • Air Inflater/Pump • Digital Tire Gage • Grease gun <p><i>*Note: automotive tools also captured by other subcategories</i></p>
Bench or Free-Standing Power Tools		
<p>Cutting, Sawing and Trimming</p> <ul style="list-style-type: none"> • Band Saw • Chop Saw • Cutoff Machine • Mitre Saw • Scroll Saw • Table Saw • Tile Saw 	<p>Other Bench or Free-Standing</p> <ul style="list-style-type: none"> • Drill Press • Drum Sander • Engraving Device • Grinder • Jointer 	<ul style="list-style-type: none"> • Lathe • Planer • Sander • Solder/Unsolder Equipment
Excluded Products		
<p>The following types of tools are outside the scope of this program:</p> <ol style="list-style-type: none"> 1. Pneumatic (Air) and/or Hydraulic Tools – Tools which are driven by a gas or compressed air/liquid and do not require electrical or battery power 2. Alternative Fuel Tools – Tools primarily powered by alternative fuels such as liquid fuel that do not require electrical power 3. Hand Tools – Non-powered hand tools (hammers, wrenches etc.) that do not require electrical or battery power 4. Stationary Power Tools – Large stationary tools that are not designed to be moved 		

The program will study the issue of pneumatic tools over the first two operational years of the program and will consider their formal inclusion, including an amendment of the plan, if warranted.

3.2 Textile Processing Machines

Textile Processing Machines	
BC Recycling Regulation Schedule 3 (excerpt)	
2.3(b) electronic or electrical tools, other than large-scale stationary industrial tools, including, without limitation, (v) sewing machines, knitting machines and other appliances for weaving or processing textiles	
Program Product Definition	
Portable/mobile electronic or electrical appliances and machines with a power cord, plug and/or battery(ies) used for embroidering, knitting, sewing, weaving or otherwise processing textiles.	
Examples of Program Products	
<ul style="list-style-type: none"> • Embroidery Machine • Knitting Machine • Overlock Machine • Punching Machine 	<ul style="list-style-type: none"> • Quilting Machine • Serger • Sewing Machine
Excluded Products	
Large stationary machines, used for any of the above purposes, which are not designed to be moved, including long arm quilting machines.	

3.3 Sports/Leisure/Exercise Equipment & Arts/Crafts/Hobby Devices

Sports/Leisure/Exercise Equipment & Arts/Crafts/Hobby Devices	
BC Recycling Regulation Schedule 3 (excerpt)	
2.3(g) electronic or electrical...leisure and sports equipment, including, without limitation...electronic or electrical biking, diving, running and rowing machines and other sports equipment with electronic or electrical components, and electronic or electrical devices for arts, hobbies or crafts	
Program Product Definition	
Portable/mobile electronic or electrical equipment or devices used primarily for sport, leisure, exercise, arts, crafts or hobbies with a power cord, plug or battery(ies) and a primary purpose that requires electricity and/or battery power	
Excluded Products	
The following types of products are outside the scope of this program: <ol style="list-style-type: none"> 1. Manual Equipment and Devices – Non-powered equipment and devices that do not require electrical or battery power (examples: selectorized exercise equipment, free weights) and equipment that does not require electricity and/or battery power for their primary purpose 2. Products captured by other stewardship plans and programs in BC 3. Products in this category designed for industrial or commercial purposes are outside the scope of the program (however those sold to industrial or commercial customers that have the same design as household products will be accepted) 	

4. Current Market and End of Life Management

Program products are distributed through retail stores, direct sales, the internet, television sales, infomercials, electrical distributors and other distribution networks. Sales are considered relatively stable as program products are typically viewed as replacement or commodity products, though power tool sales tend to rise and fall with the housing start economy.

Estimates on the quantity of program products sold annually in BC are not available at this time. The program will collect detailed sales information from all program members once the program has launched on July 1, 2012.

Current end of life practices of program products vary based on the size and material composition of the product. Power tools and textile processing machines are accepted at some private and government recycling depots, particularly those types with high metal content, where they are typically sent for scrap metal recycling. End-of-life program products that are not managed through these channels are typically landfilled.

5. Proposed Program Operations

5.1 Collection System

The program will employ a system of permanent year-round collection locations for the collection of program products in order to provide reasonable accessibility to consumers. There will be no charge to drop off program products.

The program will not directly own or manage collection sites but will contract with interested organizations that can provide a collection location. Facilities considered as collection sites include retailers, recycling organizations (both non-profit and for profit), local government recycling centres or transfer stations and other associations or businesses interested in participating in the program. It is expected that most collection sites already contracted by CESA to collect small appliances (under CESA Part 1) will also collect the program products described in this document (CESA Part 2), starting July 1, 2012 subject to collection site interest, space availability and feasibility. In addition, the products outlined in this plan will be included in any “round-up” events conducted to collect small appliances, as outlined in the CESA BC Product Stewardship Plan – Part 1: Phase 4 Products.

Alternative collection and reporting systems may be developed for program products that require special handling due to their size.

The collection network will be developed through the implementation period taking into consideration factors such as availability and capacity of facilities, proximity to population, ease of access and cost effectiveness.

CESA will work with product stewardship programs for other electronic or electrical products with regard to the collection of CESA program products by those programs, or the collection of products from other programs by CESA.

5.2 Processing and Tracking

The program intends to negotiate contracts for the recycling of program products with service providers, based on a number of factors including location, capacity, processing methods, downstream vendors and conformity with processor standards established by the program.

A tracking system will be developed to track the program products from the point of collection to the processors.

5.3 Product Life Cycle and Pollution Prevention Hierarchy

Reduce and Redesign:

The environmental impact of program products can be reduced through a reduction in toxic components, a reduction in the quantity of materials utilized in product, increased energy efficiency and increased product lifespans. The manufacturers of program products regularly review the design of these products for functionality, sustainability and impact on the environment. The program will report on initiatives within the industry that reduce the environmental impact and improve the recyclability of their products.

Reuse and Repair:

The program is designed for products that no longer work and cannot be reused. Options for managing reusable products include the BC Industrial Materials Exchange (BCIMEX) or the “Reuses” networks run by the Recycling Council of British Columbia.

Recycle and Recover:

It is the program’s intention to recycle as many components of collected program products as possible and economically feasible. The final use of materials will be considered when selecting processors. Availability of options to move materials up the hierarchy will be regularly monitored. The program will report annually on the manner in which materials are collected and processed, with reference to the pollution prevention hierarchy. Estimates may be used based on the average material composition of products.

The program will report, if feasible, on the program’s recycling rate, (the percent of collected materials recycled), by the program’s second operational year. Some products may be recycled through the scrap metal system due to their size and scrap metal value (e.g. large and bulky products such as treadmills). The program may, therefore, not have access to the detailed information required to report this metric for all product types.

Environmental Impact:

The program will report annually on the estimated greenhouse gas (GHG) impact of the program, commencing with the program’s 2013 annual report. Once this baseline has been established, the program will develop strategies to improve the environmental outcomes of the program and will report annually on these efforts.

5.4 Consumer Awareness

The Regulation requires that the plan makes adequate provision for informing consumers of the program, the location of collection facilities, as well as the environmental and economic benefits of participating in the program. The strategy will be modified over time in response to the effectiveness of the program.

Key Messages:

It is important that consumers are aware of the importance of returning program products, where to return them and appropriate handling techniques. Specific information will be provided on:

- The categories of products included in the program
- Return options and handling procedures
- Applicable fees and how they are used

With an increasing number of stewardship programs available for electric and electronic products, the program will work with the other stewardship programs to try to provide a coordinated message to consumers.

Communication Methods:

The Program will use a number of methods to create consumer awareness of the program. These include:

- **Website**- The program website will have information on what items can be returned and how to return them. A map based depot finder will be available. It will also include a print-ready brochure and a system for reordering consumer information materials produced by the program.
- **Recycling Hotline** 1 800 667 4321 or 604 RECYCLE- The program will participate in the Recycling Council of British Columbia (RCBC) recycling hotline service. Consumers can contact RCBC operators during business hours and obtain information about return options for program products.
- **RCBC Recyclepedia** – The program will provide RCBC with updated lists of collection sites for inclusion in their online search system, which informs consumers of their return options.
- **Point of Return** – Any participating collection depots will be offered program signage to display and counter cards to distribute to consumers.
- **Earned media and advertising** – The Program will target the use of earned media (press releases etc) and paid advertising.
- **Direct Mailings and Communications** – The program will directly target commercial generators of program products through dedicated mailings and partnerships with relevant associations and groups.
- **Other** – Other methods of communications may be identified by the program and explored for potential effectiveness.

Partnerships:

The program will work towards partnering with organizations interested in collaborating to promote the program. Collaboration strategies will be developed through discussions with potential partners. Some possible avenues are:

- **Retailers**- Point of sale materials could include shelf-talkers, counter cards, consumer brochures and/or program posters, provided at no cost to retailers.
- **Other Stewardship Programs** – Opportunities to combine communication efforts with existing stewardship programs will be explored.
- **Municipal and Regional District Partnerships** – The program will seek opportunities to partner with local governments, including:
 - Advertising in municipal calendars

- Participation in community recycling events and promotions
- Links from local government websites to Program website and inclusion of program information in recycling specific web pages
- Inclusion of program information with local government householder communications
- **Trade Associations and Business Organizations** – The program will explore partnerships with trade associations and other business organizations to target commercial generators of program products.
- **Others** –Brand owners and other agencies with an interest in recycling may wish to have links to the proposed stewardship agency website.

The communication strategy will be modified over time based on the results of the methods employed and ongoing studies.

5.5 Program Administration

Program Budget:

The program will be managed and funded by members of the program based on fees on the sale of new program products in British Columbia. Fees will be subject to HST and may be passed on by the members to their customers, either as visible fees or by incorporating the cost directly into the price of the product. The fees will be set using estimates for program costs and product sales units. Fees may be adjusted in the future to address surpluses or deficits, but all fees will be used for program purposes.

Reserve Fund:

As part of its risk management system, the program intends to build and maintain a reserve fund. The reserve fund will stabilize program funding in the case of unexpected collection volume increases, fluctuations in operating costs or reduced revenue due to economic or other factors.

Producer Compliance:

In order to maintain a 'level playing field' for the program members and to ensure compliance with the Regulation, the program will actively search for, identify and recruit producers of program products. If a potential member has not joined the program (or an equivalent program) despite repeated notifications of their obligations, the program will refer the matter to the BC Ministry of Environment for regulatory compliance and potential enforcement proceedings.

Dispute Resolution:

The Program will contract with all suppliers and service providers to the program by the use of commercial agreements. Any disputes arising from collection or processing contracts would be resolved using normal commercial legal procedures.

6. Performance Measures and Targets

CESA will assess the performance of the program with the quantitative measures noted below, which will be presented in the program's annual reports.

6.1 Collection Rate

The program intends to track and report on the quantity of program products collected on an annual basis, expressed as units or weight, and to target annual increases in the quantity collected. The program will report this absolute collection figure as a provincial total, by Regional District and on a per capita basis. The program will also report on the program's annual recovery rate, which will compare the number of units or weight collected in a year to the number of units or weight sold in that year.

Meaningful data on expected sales, lifespans and collection rates is not available at this time. Experience and data gathered in the first 18 months of collection will permit meaningful collection rate targets to be established in 2013, and will be submitted to the BC MoE by April 1, 2014. These targets will be based on either absolute collection or a recovery rate (or a possible combination).

The program will conduct a public consultation event through the use of webinars on these targets. The targets will be submitted to the BC Ministry of Environment in letter form, as a supplement to the filed program plan.

The program will conduct a waste composition study, possibly in collaboration with regional districts and other stewardship agencies, prior to the submission of the collection rate target in 2014 to support the baseline collection data.

Table 1 – Collection Rate Performance Measures and Targets

Performance Measures	Targets
Collection Rate:	
Absolute collection (units and/or weight collected)	Targets to be set at the end of 2013 and submitted to the BC MoE by April 1, 2014 (if applicable)
Absolute collection by Regional District	To be reported only
Absolute collection per capita	To be reported only
Recovery Rate (%) – units or weight collected/ units or weight sold	Targets to be set at the end of 2013 and submitted to the BC MoE by April 1, 2014 (if applicable)

6.2 Consumer Awareness

The proposed consumer awareness plan is described in Section 5.4 above. To create a baseline of consumer awareness of the program, the program proposes to conduct a consumer awareness survey by the end of 2012, after six months of program operation. The program will then complete further consumer awareness surveys in 2014 and 2016 to measure the performance of the communication strategy. The program will target a consumer awareness level of 30% by 2014 and 40% by 2016.

The program will also track and report on the quantity of program website visits, RCBC Recyclepedia visits and RCBC Hotline calls for program information.

Table 2 – Consumer Awareness Performance Measure and Targets

Performance Measure	Targets
Consumer Awareness:	
Consumer awareness level	30% by 2014, 40% by 2016
Program website visits	To be reported only
RCBC Recyclepedia website visits and Hotline calls for program information	To be reported only

6.3 Collection System and Accessibility

The program will target a minimum of 60 collection sites by the end of 2012, 75 by the end of 2013 and 100 by the end of 2014, distributed across the province. The program will also target an accessibility standard of 90% of the provincial population having access to a collection site by the end of 2014, where access is defined as within a 30 minute drive for those in urban areas and a 45 minute drive for those in rural areas.

These targets do not apply to large, bulky products that may require special handling due to their size until more information is available on how these products will be collected.

Table 3 – Collection System and Accessibility Performance Measures and Targets

Performance Measures	Targets
Collection System and Accessibility:	
Number of collection sites	60 by the end of 2012, 75 by the end of 2013 and 100 by the end of 2014
Percent of population with access to a collection site	90% by the end of 2014

7. Stakeholder Consultations

A stakeholder consultation process was held in August and September, 2011 as a prerequisite to the filing of this plan. The consultation included:

- Web based consultation using the www.cesarecycling.ca website
- Email communication to stakeholders and notification through the RCBC member advisory service, as well as other organizations
- Physical events in Richmond and Nanaimo
- Dedicated webinars for the Southern Interior and Northern BC regions

- Webinar for a general audience
- Written submission provided by stakeholders
- Meetings with key stakeholders

Results of consultation meetings are summarized in Appendix A.

Appendix A – Consultation Summary

Feedback received at the consultation events and via email is summarized in the table below. The left-hand column outlines the specific question or comment and the right-hand column outlines the applicable response. The number in brackets refers to the number of times the issue was raised

Issue Raised:	Response:
General:	
The plan is insufficiently detailed to provide enough information on how the program will operate or how consumers will be affected. (1)	The plan provides all applicable details that the program is able to provide at this time. In many cases, applicable data on sales, expected recovery volumes, collection site coverage etc. is not available. As discussed in Section 6, the program is committed to conducting public consultation on applicable program targets as they are developed in the coming years once baseline data is available.
The program’s approach to consultation is inadequate. The consultation timeline did not provide for a reasonable amount of time after comments were closed to consider stakeholder comments and revise the plan accordingly. (1)	The program conducted five consultation events to ensure all stakeholders would have an opportunity to submit comments, including a general audience webinar, in-person events in Richmond and Nanaimo, and dedicated webinars for both the Southern Interior and Northern BC. In addition, the plan was posted and written comments were accepted for over a month. The program reviewed comments as they were received, and considers that sufficient time was available to review and take into account all submitted comments.
Program Products:	
How do the sales of excluded products (pneumatic and fuel-powered tools) compare to power tools included in the program? (1)	The program does not yet have detailed sales data on the products included and excluded from this plan. Industry representatives consider that a significant majority of power tool sales are electrical power tools, which are included in the program.
What is the lifespan of power tools? (1)	The lifespan of a power tools varies based on the manufacturer and the model. The program does not yet have lifespan estimates, but will be conducting related research during the implementation phase of the program.
Does the program apply to both residential and commercial use power tools? (1)	Yes. Power tools are included in the program regardless of whether they are marketed to residential or commercial users. Section 3.1 lists the products included and excluded from the plan.
Collection System:	
Will the program consider expanding its collection network beyond ESABC depots to provide better provincial coverage than the electronics stewardship	Yes. The program is committed to developing a collection network that provides convenient access across the province. While it is the program’s intent to mirror the collection network of the electronics program where

program? (2)	possible to provide simplicity to consumers, additional sites will be considered in order to improve collection system convenience.
Collection points should be co-located with other programs, including the program covering outdoor power equipment. (3)	It is the program's intent to co-locate as many as possible of the collection sites with other stewardship programs which collect electrical or electronic products, as well as other locations where the program considers service is desirable and opportunities are present.
How will collection points be compensated for collecting program products? (2) Collection points should be fairly compensated for their services and the program should not rely on voluntary partners. (1)	The program's objective is to provide a province-wide collection system with good consumer convenience while at the same time managing a cost effective program. The program will enter into contractual arrangements with every collection site, including monetary compensation as required.
What kind of training will the program provide to collection sites so that they can educate those that drop off products? (1)	Each collection site will receive required training and will be provided with a detailed guidance manual that explains all aspects of the program. The program will also conduct site visits to ensure that collection sites are meeting the standards of the program. The program will provide signage to all collection sites that explain the types of products included in the program. Point of return materials, such as brochures, will also be provided.
The program should use a deposit refund system to encourage high recovery rates.(1)	The program is not considering a deposit-refund system, which requires significant administrative expenses. In the opinion of the program, deposits are not a necessary or appropriate tool for this type of product. The program will provide a free and convenient collection system across the province.
Consumers should not be required to pay an "eco-fee" on the sale of program products in areas of the province that are not serviced by a collection point. (1)	Both urban and rural areas of the province provide challenges to any organization attempting to provide province wide services. It is expected that the program will achieve a high rate of collection site availability, based on the parameters specified in the program.
The program should consider contracting bottle depots as collection sites as the public is aware of their locations and most are able to collect additional material under their current zoning. (1)	The program is actively exploring this option and expects to contract with a number of bottle depots, where appropriate.
Regional Districts should be compensated for managing program products that end up in regional landfills. (1)	The program does not consider this approach to be an element of product stewardship. The program's aim is to provide an accessible collection network for program products and a communication strategy to inform consumers of the program's collection system. The program will work with local governments regarding landfill bans.
An adequate number of drop-off facilities are required in rural communities. Service levels should be based on	The program aims to provide reasonable levels of access to all British Columbians, including those living in rural communities.

population centres. (2)	
<p>As a minimum service level, a depot, return-to retail location or curbside collection service should be provided in each community (including population within 30 km radius) of greater than 3,000 residents. 18 months is an acceptable transition period to establish this level of service from the date of program implementation.</p> <p>As a minimum service level, drop off events should be held annually in communities (including population within 30 km radius) of less than 3,000 residents where product purchasing ability is limited. Events should be initiated within the first 18 months of program implantation. (1)</p>	<p>The program is dedicated to establishing a collection system that provides reasonable levels of access to all British Columbians. Once the initial collection network is established, the program will review the need to site additional depots and establish collection events. Collection system and accessibility targets are outlined in Section 6.3.</p>
Product Life Cycle:	
<p>Product stewardship programs do not provide effective incentives to manufacturers to redesign their products. (1)</p>	<p>The program will report on initiatives within the industry that reduce the environmental impact and improve the recyclability of their products. The program's initial focus will be to promote reuse, where applicable, and will provide an environmentally appropriate collection and recycling system for all program products.</p>
Processing:	
<p>Exercise equipment and other steel-rich products should be transported directly from collection points to scrap metal recyclers, who can handle these types of products. (1)</p>	<p>The program is actively exploring this option and will consider working with scrap metal recyclers.</p>
<p>The program should report on the final disposition of materials in its annual reports, including what countries materials are managed in. (1)</p>	<p>The program will report on the final use of collected materials, as outlined in Section 5.3 above. The program will work with registered program processors to provide relevant details on the final disposition of materials, where possible.</p>
Consumer Awareness:	
<p>The program should work with local governments and other stewardship programs to research the problem of abandoned program waste, and develop a strategy to address this issue. Performance measures and targets should be developed in relation to abandoned waste. (1)</p>	<p>The program is committed to working with local governments and other stewardship agencies to better understand the problem of abandoned waste and explore opportunities to address this issue.</p>
<p>The program should not rely on</p>	<p>The program will partner with organizations and companies</p>

voluntary partners (regional districts, etc.) to advertise the program. (1)	that have an interest in assisting in the promotion of the program, but only as a part of a broader communications strategy.
Performance Measures:	
The program should use existing waste composition studies and/or develop their own to evaluate the effectiveness of the program. (1)	A commitment to participate in a waste composition study, in possible collaboration with regional districts and other stewardship agencies and to help evaluate the performance of the program, has been added to Section 6.1 above in response to this comment.