

Ministry of Environment
Attention: Director, Extended Producer Responsibility Programs
PO Box 9341, STN PROV GOVT
Victoria, BC V8W 9M1

Via Email: ExtendedProducerResponsibility@gov.bc.ca

June 30, 2020

Dear Director:

Re: Smoke / CO Alarm Stewardship Program 2019 Annual Report

Pursuant to the British Columbia Recycling Regulation, 449/2004, issued under the Environmental Management Act (O.C. 995/2004), please find attached the 2019 annual report for the Smoke and Carbon Monoxide alarms Stewardship Program for the period January 1, 2019 through December 31, 2019.

We request confirmation of receipt and approval of the report so that we may make it public by posting it on our website.

If you have any questions regarding this report, please contact me at (778) 331-6968 or mannie@productcare.org.

Yours truly,

A handwritten signature in blue ink, appearing to read "Mannie Cheung", with a stylized flourish extending to the right.

Mannie Cheung
Vice-President, Operations
Product Care Association

cc. Meegan Armstrong
Hanna Vovk

British Columbia Alarms Program Annual Report

June 30, 2020

Submitted by:

Product Care Association of Canada



productcare.org

Table of Contents

1	Executive Summary.....	3
2	Program Outline.....	6
3	Public Education Materials and Strategies	7
4	Collection System and Facilities.....	10
5	Product Environmental Impact Reduction, Reusability and Recyclability	11
6	Pollution Prevention Hierarchy and Product / Component Management	12
7	Product Sold and Collected and Recovery Rate.....	13
8	Revenues and Expenditures.....	16
9	Plan Performance	17
	Appendix A: Communication and Public Outreach Materials	18
	Appendix B: List of 2019 Program Collection Sites.....	25
	Appendix C: 2019 Breakdown of Collection Sites by Regional District.....	31
	Appendix D: 2019 Audited Financial Statements	32
	Appendix E: 2019 Independent Non-Financial Audit.....	41

1 Executive Summary

The BC Smoke and Carbon Monoxide (CO) Stewardship Program (“Program”) began on October 1, 2011. The Program is operated by Product Care Association of Canada (“Product Care”) pursuant to the requirements of the *British Columbia Recycling Regulation* (BC Reg 449/2004 as amended) (“Regulation”) under the Province’s *Environmental Management Act*, as well as the BC Smoke and Carbon Monoxide Alarm Stewardship Plan approved by the BC Ministry of Environment and Climate Change (BCMoeCCS) on August 17, 2011 (“Program Plan”). Product Care submitted an amended program plan on August 15, 2016, which is under review by the BCMoeCCS.

This annual report provides the information required pursuant to section 8(2) of the Regulation covering the period from January 1 to December 31, 2019.

Products within plan	Residential-use smoke and carbon monoxide (CO) alarms
Program website	www.productcare.org

Program performance details required under s.8(2) of the Regulation are summarized in the chart below.

Recycling Regulation Reference	Topic	Summary
Part 2, Section 8(2)(a)	Public Education Materials and Strategies	<ul style="list-style-type: none">• Consumer awareness survey conducted in December 2018 revealed 42% of BC residents were aware that smoke and CO alarms can be recycled in British Columbia.• Two websites (productcare.org / regeneration.ca) provide detailed information about the Program for members and service partners.• Point of sale and point of return materials available for free upon request.• Advertised through digital campaign, including Google display ads and targeted blog posts.• Published print ads in 2019 municipal waste and recycling calendars and newspaper.

Recycling Regulation Reference	Topic	Summary
		<ul style="list-style-type: none"> • Participated in numerous community events (e.g. Party for the Planet, Vancouver Pride Festival, etc.) • Collaborated through RCBC's Hotline and Recyclepedia and the SABC Recycling Handbook to provide consumer-facing information about the program. • Focused on community partnerships and collection during Fire Prevention Week.
Part 2, Section 8(2)(b)	Collection System and Facilities	<ul style="list-style-type: none"> • At the end of 2019, the collection system included 207 contracted collection sites, including 72 return-to-retail locations, 23 local government facilities, 3 fire departments and 109 private recycling depots.
Part 2, Section 8(2)(c)	Product Environmental Impact Reduction, Reusability and Recyclability	<ul style="list-style-type: none"> • Ionization foil stamping technology ensures less waste produced and fewer precious metals used in this stage of the manufacturing process. • Amount of materials in alarms continue to decrease while the use of recyclable materials in packaging increase. • There is a general trend in the industry to move from 9 volt to 3 volt alarms reducing the number of batteries required for product operation. • Some manufacturers are looking into implementing best practice environmental standards from one region across all products sold to different countries.
Part 2, Section 8(2)(d)	Pollution Prevention Hierarchy and Product / Component Management	<ul style="list-style-type: none"> • The plastic and metal components (copper, aluminum, ferrous, etc.) are separated and recycled. • For alarms with radioactive components, the radioactive component (Am-241 foil) is shipped for final disposal at a licensed radioactive waste facility.
Part 2, Section 8(2)(e)	Product Sold and Collected and Recovery Rate	<ul style="list-style-type: none"> • As per the approved Program Plan, due to the limited number of manufacturers in the sector, aggregated sales data is not made publicly available to protect confidential market share information.

Recycling Regulation Reference	Topic	Summary
		<ul style="list-style-type: none"> Between January 1 and December 31, 2019, the Program collected approximately 111,186 units.
Part 2, Section 8(2)(e.1)		<ul style="list-style-type: none"> Table 4 lists units collected by Regional District.
Part 2, Section 8(2)(f)	Summary of Deposits, Refunds, Revenues and Expenses	<ul style="list-style-type: none"> See Appendix D for the Program's Independent Financial 2019 Audit report.

The Program Plan sets out a number of key performance targets for the Program up to 2016. The Program did not envision operating under the current program plan in 2019. Accordingly, the plan does not provide performance targets for 2019. The following chart summarizes the Program's performance in 2019 and strategies for improvement going forward, where applicable.

Given the new program plan submitted in 2016 had not been approved as of the end of 2019, this annual report references performance targets from 2016, with the exception of units collected which reports against 2017 collection targets set in 2013 as an amendment to the Program Plan.

2019 Key Program Measures and Performance

2019 Key Program Measures and Performance	
Part 2 section 8(2)(g)	
2019 Performance	Strategies for Improvement
Approximately 111,186 units collected (2017 collection target of 28,078 units based on 5% annual increase from 2012 baseline of 22,000 units, as per collection targets set in 2013.)	n/a
As part of SABC, the Program continued to work with other stewardship organizations to conduct outreach with stakeholders. In addition, the Program engaged RCBC for hotline and Recyclepedia services.	The Program will continue to reach out to other organizations and stewardship programs, where synergies exist.

Based on an accessibility study conducted in 2019 by an independent third party, 99.6% of the population has access to a collection site according to SABC's Accessibility Standard.	n/a
--	-----

2 Program Outline

The BC Smoke and Carbon Monoxide (CO) Alarm Stewardship Program ("Program") began on October 1, 2011. The Program is operated by Product Care Association of Canada ("PCA") pursuant to the requirements of the *British Columbia Recycling Regulation* (BC Reg 449/2004 as amended) ("Regulation") under the Province's *Environmental Management Act*, as well as the BC Smoke and Carbon Monoxide Alarm Stewardship Plan, approved by the BC Ministry of Environment and Climate Change Strategy (BCMoECCS) on August 17, 2011 ("Program Plan").

Product Care is a federally incorporated, not-for-profit product stewardship association formed in response to stewardship regulations and is governed by a multi-sector industry board of directors, which includes representation from members with a commercial presence in British Columbia.

Product Care submitted a revised Plan to the Ministry on August 15, 2016, which is currently under review with the Ministry. In the interim, the Program continues to operate pursuant to the terms of the 2011-2016 Program Plan. This annual report provides information required pursuant to section 8(2) of the Regulation covering the period from January 1 to December 31, 2019.

Program members include manufacturers, brand owners, distributors, first importers and retailers. A current list of Program members is available on Product Care's website.

Products that are managed through the Program include:

- Smoke alarms designed for residential-use as defined by the CAN/ULC-S531 standard.¹
- Carbon monoxide (CO) alarms designed for residential use, as defined by the CAN/CSA 6.19 standard.

By the end of 2019, the Program had developed a collection network of 207 permanent year-round contracted collection sites. The Program does not directly own or manage collection sites, but rather contracts with all collection locations. Collection sites include fire safety organizations, fire halls, private bottle depots, not-for-profit recycling organizations, retailers, and local government facilities.

¹ Underwriters Laboratory of Canada (ULC) Standards develops and publishes standards and specifications for specific product types, including those having a bearing on fire safety. Fire alarms installed in dwelling units must conform to the CAN/ULC-S531-02 standard.

The Program's website is a consumer-facing portal where the public can obtain information about the Program, including what products are accepted in the Program, where to find the nearest collection site, promotional materials and membership information. Further details on education and outreach efforts are outlined in Section 3 of this report.

The Program, pursuant to the terms in its approved Program Plan, established a collection rate target increase of 5% per annum with the 2012 collection volume of 22,000 units as a baseline. Approximately 111,186 alarm units were collected, exceeding the 2017 collection target of 28,078 by 83,108 units or 295% (see Table 3).

3 Public Education Materials and Strategies

In 2019, Product Care implemented a number of different methods to raise consumer awareness of the Program in British Columbia, in accordance with regulatory requirements. This section provides details regarding communication and public education efforts in 2019.

3.1 Consumer Awareness

In November 2018, an online survey representative of British Columbia's adult population was conducted among 1,002 residents. The survey revealed that 42% of residents are aware that they can recycle alarms in the province. The next survey is scheduled for fall 2020 as the program committed to conducting awareness surveys every two years.

Manufacturers recommend that alarms be replaced every 10 years, and those who live in multi-family residential properties typically do not dispose of old alarms themselves, but rather have these products removed by property managers or professional service providers. The awareness levels reported are reflective of the long lifespan of these products and the fact that consumers interact with the product on a very infrequent basis.

3.1.1 Website

In January 2019, the regeneration.ca website was replaced with the new Product Care website, productcare.org. The new website reflects a refreshed, consolidated brand focused on an improved user experience for consumers, industry and members. Similar to regeneration.ca, the Product Care site includes the following content for its alarms recycling program, per the commitment in the program plan:

- Recycling locator: A searchable map displaying locations of all the Program's collection sites and drop-off events, including location and hours of operations. (see Appendix A)
- Lists of accepted and non-accepted products
- Important consumer information (including a description of Environmental Handling Fees (EHFs), a description of the Program, etc.)

- Information about Product Care Association of Canada, including annual reports, program plans, and membership information
- Consumer videos showing the product management approach for alarms
- A fillable form for ordering promotional materials, including rack cards and posters
- Information for consumers on how to manage smoke and carbon monoxide alarms in a safe manner
- An estimated 527,307 unique visitors accessed *productcare.org* during the 2019 calendar year. The British Columbia alarms section (including sub-sections for accepted products, EHF information) received 16,588 total page views. In addition, there were a total of 102,974 searches for British Columbia collection sites using the recycling locator.

3.1.2 Program Hotline

Product Care continued to operate a toll-free hotline (1-888-772-9772) where consumers obtained information about the Program.

The Program also participated in the Recycling Council of British Columbia (RCBC) recycling hotline service (1 800 667 4321 or 604 RECYCLE). Consumers were able to contact RCBC operators during business hours and obtain information about return options for alarm products. Information about alarm recycling was also provided on the RCBC smart phone app and website. In total, these three platforms received a combined total of 410 inquiries about alarm products in 2019.

3.1.3 Print Advertising

The Program continued to promote the Program through a variety of print medium throughout the province:

- In October 2019, a direct mail campaign to promote the recycling of smoke and CO alarms was put into market. Approximately 42,800 promotional flyers (see Appendix A) were mailed via Canada Post to residents in Chilliwack, Enderby, Ucluelet, and Merritt.
- In October 2019, during Fire Prevention Week, Product Care partnered with the Delta Fire Department to distribute more than 1,500 smoke alarm activity cards to Delta students (kindergarten to grade 4) in order to generate awareness amongst students and their families (see Appendix A)
- Ads focusing on general consumer education about the Program and other stewardship programs managed by Product Care in BC, were published in municipal calendars for Chilliwack, Invermere, Mission, Penticton, Powell River and Peace River. An estimated 48,000 calendars were distributed throughout the six areas.

3.1.4 Television

Static TV advertisements (i.e. an advertising tile that remains on the screen as a static image while a program is airing) aired alongside current news and weather programs from July to September 2019, resulting in 12,600,000 impressions.

3.1.5 Digital Advertising

All digital campaigns listed below reached the entire province.

1. **Google Search Advertising Campaign:** January to December, 2019

A search advertising campaign served alarm recycling ads to provincial residents based on an extensive list of relevant keyword searches. British Columbia's ads collectively generated 1,710 impressions and 168 clicks.

2. **Google Display Advertising Campaign:** April to December, 2019

- British Columbia specific display advertising campaign served alarms-related ads to provincial residents based on increasingly refined targeting.
- The ads received a total of 5 million impressions and 17,186 clicks.
- These ads were specifically targeted to internet users who performed online searches related to smoke and CO alarm purchasing, usage, and disposal in British Columbia. Secondary targeting focused on individuals searching for home improvement and DIY-related terms, in order to reach a wider, but still relevant, population of homeowners and new home buyers.

3. **Facebook Advertising Campaign:** April to December, 2019

British Columbia specific ads promoted the alarms recycling program with the use of both image and video ad formats throughout the year. In October, for Fire Prevention Week, the alarms "Explainer" video was promoted along with a targeted Facebook campaign (both organic and paid), with messaging to complement with the print mailout (see Print advertising section).

4. **Gated Facebook Content Strategy:** British Columbia specific content, available only to province residents, focused on alarm recycling, special waste and the recycling community in general.

5. **Targeted blog posts:** More than 30 blog posts were targeted at relevant audience members including, but not limited to, homeowners, female heads of households, and environmentally-inclined individuals in British Columbia. Topics included specific information on alarms recycling, "do it yourself" ("DIY") content, renovation tips, and sustainability best practices. All posts included a call-to-action to find a collection site or interact with the brand on social media. Collectively, these posts received 45,568 views in 2019.

6. **Spotify and Zone 4 ads:** Complementary Spotify audio and display ads (see Appendix A) aired from September to November 2019, resulting in over 867,000 impressions

3.1.6 Community Events and Partnerships

The Program exhibited at BUILDDEX Vancouver in February 2019. This two day-long trade show and conference attracted over 14,000 industry professionals from the construction, property management, interior design, renovation, and architecture industries.

In addition, the Program attended multiple events with the goal of educating the public on the importance of waste diversion and recycling, including:

- Party for the Planet (City of Surrey): April 14
- Vancouver Pride Festival: August 5

At these events, knowledgeable staff interacted with thousands of event attendees through a direct engagement program including trivia, giveaways, branded print materials, and other activities.

Product Care also sponsored Science World's BC Green Games; a digital eco-storytelling contest for schools throughout British Columbia. As part of the sponsorship, Science World's "On the Road" team visited schools across the province educating more than 36,000 students on BC stewardship programs, including alarm recycling. In addition, the BC Green Games website listed Product Care as a sponsor with a description of its various recycling programs.

3.1.7 Point of Sale (PoS) and Point of Return (PoR) Materials

In 2019, Product Care distributed both PoS and PoR materials upon request by retailers and collection sites. The following materials were available for order through an online form:

- Rack cards
- Posters

4 Collection System and Facilities

The Program works with existing collection sites across BC where end users can return their smoke and CO alarms. There is no charge for consumers to drop-off these products. Product Care does not directly own or manage any collection sites, but rather contracts with all collection sites. At the end of 2019, the collection system was comprised of 207 contracted advertised collection sites, including 72 return-to-retail locations, 23 local government facilities, 3 fire departments and 109 private recycling depots. Seven collection sites were added and one collection site was removed during 2019. The one collection site that closed was located in Fort St. John where two other collection sites exist, resulting in no impact to accessibility levels for the program. Table 1 below provides a breakdown of the different types of collection sites reported in 2018 and 2019. Appendix B provides a complete list of collection sites as of December 31, 2019. Appendix C lists the number of collection sites in each regional district.

An accessibility study of the Program's collection network was completed by an independent third party consultant in 2019. Given the collection network at the end of 2019, the program maintained an accessibility level of 99.6% based on the Accessibility Standard established by the Stewardship Agencies of BC (SABC). This Standard defines minimum accessibility levels as a 30 minute drive or less to a collection point in urban centres with a population greater than 4,000, and a 45 minute drive or less for those living in rural communities greater than 4,000 people.

Table 1: Collection Site by Type (2018 and 2019)

Collection Site Type	2018	2019
Retailers	72	72
Local government	21	23
Recycling depots	106	109
Fire departments	2	3
Total	201	207

The Program supplements the collection system with a Large Volume Generator (LVG) program. The LVG program provides free pick-up service from any entity that generates large volumes of smoke and CO alarms (i.e., more than 40). In 2019, 66 entities were registered as LVGs with the Program, including fire safety organizations, electrical distributors, local government facilities and others.

5 Product Environmental Impact Reduction, Reusability and Recyclability

Reduce and Redesign

While the principal purpose of smoke and CO alarms is to ensure safety, the industry continues to make efforts to reduce the environmental impact of their products. Ionization foil stamping technology ensures less waste and precious metals are produced in this stage of the manufacturing process. The amount of plastic and other materials in a typical smoke alarm continue to decrease while the use of recyclable materials in product packaging increase. For example, some manufacturers now create alarms with 75% to 80% recyclable materials. Finally, there is a continued trend in the industry away from 9 volt to 3 volt alarms to reduce the number of batteries required for product operation.

Manufacturers regularly review the design of their products for functionality, sustainability and impact on the environment, ensuring compliance with environmental requirements. In addition, some manufacturers are looking into implementing best practice environmental standards from one region across all products sold to different countries, rather than just implementing the standards in the country that mandates them. An example of a best practice environmental standard is the RoHS (Restriction of

Hazardous Substances) initiative in Europe, which restricts the use of certain hazardous materials found in electrical and electronic products.

Reuse and Repair

Given the requirement that new smoke and CO alarms be certified for safety purposes and the absolute importance that program products function properly in the case of an emergency, the repair or reuse of returned products or product components is not promoted by the Program.

Recycle, Recover and Dispose

It is the Program's intention to recycle as many components of returned products as possible, subject to economic conditions, such as fluctuations in demand and commodity prices.

6 Pollution Prevention Hierarchy and Product / Component Management

The following is based on information provided by the Program's downstream processors, where available, or based on the understanding of the service agreement with the downstream processors.

There are generally three types of common smoke alarms; ionization, photoelectric and combination ionization/photoelectric. Alarms that use the ionization technology have a radioactive source within the detector to ionize the air and produce a small electric current. When smoke enters the detector chamber, the current is interrupted, which causes the alarm to sound. The radioactive element used is most commonly Americium-241 (Am-241), which emits alpha radiation (or alpha particles). The source of radioactivity is quite small. Photoelectric alarms aim a light source into a sensing chamber at an angle away from the sensor. Smoke enters the chamber, reflecting light onto the light sensor; triggering the alarm. Combination ionization & photoelectric alarms use both sensing technologies in parallel.

The boxes of collected units are received at Product Care's facility. At the facility, they are sorted, which involves counting the number of alarms and removing batteries (those that are easily removable) as well as any non-program products.² Product Care's processors also inspect incoming units to ensure any remaining batteries are removed. Any batteries that are not removed at Product Care's facility is removed and managed by the downstream processor.

At the downstream processors' facilities prior to dismantling, each smoke alarm is sorted by type, and inventoried by a trained technician. According to information obtained from end fate surveys completed by the downstream processors, the plastic and metal components are separated and sent for recycling and the Am-241 foil is shipped for long-term storage at a licensed radioactive waste facility. Table 2

² Some of the alarms collected in 2019 were not shipped for processing until the subsequent year. Statements regarding the end fate of alarms are in reference to materials processed in 2019 only.

provides a summary of the management of all alarm sub-components, according to information provided by the Program's downstream processor.

In addition, batteries contained in alarms collected in 2019 were removed from each unit by Product Care at its Delta facility and stored on site. No batteries were sent for processing as there were insufficient volumes accumulated for a shipment. Any batteries remaining in units sent to the Program's two downstream processors were removed and sent to a downstream battery processor for further processing.

Table 2: Product / Component Management ³

Type of Alarm	Sub-component	Recycled	Storage at a licensed long-term storage facility
Radioactive Alarms	Radioactive Cells		100%
	Plastic	100%	
	Metal	100%	
Photovoltaic (non-radioactive alarms)	Plastic	100%	
	Metal	100%	

7 Product Sold and Collected and Recovery Rate

Products Sold

The BC smoke and CO alarm market is primarily served by three brand owners. Given the small number of manufacturers of these products selling into the BC market, the Ministry of Environment and Climate Change Strategy has given approval that aggregated sales data reported by program members not be made publicly available, as is done with other stewardship programs.

Collection Volumes

Smoke and CO alarms are collected at collection sites in boxes, cardboard gaylord boxes or mega-bags, depending on the volume the collection site expects to receive. Between January 1 and December 31, 2019, the Program collected approximately 111,186 units, as detailed in Table 3 below.

The number of alarms collected in small containers (boxes and totes) and mega-bags was estimated by multiplying the number of small containers and mega-bags collected during the year by a conversion

³ Based on information provided in end fate surveys completed by the Program's primary processors.

factor of 43 alarms per small container and 1127 alarms per mega-bag. The conversion factors were calculated by averaging the units of alarms from more than 2,200 small collection containers and 13 mega-bags, which were sorted and counted in 2019 at Product Care's facility.

Table 3: Units Collected, January 1 – December 31, 2019

Container Type	# of Containers Collected	Approximate # of Alarms Collected
Small Containers	2,245	96,535
Mega Bags	13	14, 651
Total	2,259	111,186

Units Collected by Regional District

Table 4 sets out the approximate number of smoke and CO alarms collected from each of the Province's Regional Districts between January 1 and December 31, 2019.

Table 4: Total Smoke and CO Alarms Collected by Regional District, 2019

Regional District	# Small Containers ⁴	# Mega Bags ⁵	# of Smoke & CO Alarms
Alberni-Clayoquot	7	0	301
Bulkley-Nechako	6	0	258
Capital	178	0	7,654
Cariboo	6	0	258
Central Coast	0	0	0
Central Kootenay	10	0	430
Central Okanagan	116	0	4,988
Columbia-Shuswap	1	0	43
Comox Valley	32	0	1,376
Cowichan Valley	43	0	1,849
East Kootenay	10	0	430
Fraser-Fort George	16	0	688
Fraser Valley	116	9	15,131
Kitimat-Stikine	1	0	43
Kootenay Boundary	14	0	602
Metro Vancouver	1422	4	65,654
Mount Waddington	1	0	43
Nanaimo	66	0	2,838
North Coast	6	0	258
North Okanagan	40	0	1,720
Northern Rockies	0	0	0
Okanagan-Similkameen	42	0	1,806
Qathet	22	0	946
Powell River	0	0	0
Skeena-Queen Charlotte	0	0	0
Squamish-Lillooet	27	0	1,161
Strathcona	20	0	860
Sunshine Coast	10	0	430
Thompson-Nicola	33	0	1,419
Total	2245	13	111,186

⁴ Conversion factor used: 43 units per small container.

⁵ Conversion factor used: 1127 units per mega-bag

Product Care submitted Program collection rate targets to the Ministry of Environment on April 1, 2013 in accordance with its commitment under the approved Program Plan. In the submission, PCA committed to a 5% annual increase in the number of program products collected over the 2012 baseline of 22,000 units up to 2017. The Program collected approximately 111,186 units in 2019, exceeding the 2017 collection target of 28,078 units by 79,033 units.

Recovery Rate

Given the unique nature of the smoke and CO alarm market in BC, the Program cannot report out on recovery rate as a performance measure. Recovery rate compares the amount of materials collected to the amount of material sold during the same time period. Collection and sales data are typically published alongside the recovery rate in order to substantiate a percentage based recovery rate. In the case of smoke and CO alarms, given the small number of companies selling these products into the BC market, providing this data would permit competitors to estimate the sales data of individual companies, which is confidential business information.

8 Revenues and Expenditures

The Program is funded by membership fees, known as environmental handling fees (EHFs), remitted to PCA by its members based on the volume of sales of smoke and CO alarms in British Columbia. PCA sets the EHF rates. In some cases, retailers recover the fees from consumers as a separate visible EHF. Program revenues are applied to the operation of the Program, including administration, education, collection, transport, recycling and disposal of collected products, as well as a reserve fund. Table 5 illustrates the EHFs for Program Products effective since October 1, 2011.

Table 5: Environmental Handling Fees as of October 1, 2011

Unit Type	EHF
Smoke Alarms and Combination Smoke/CO Alarms	\$1.20
Carbon Monoxide (CO) Alarms	\$0.60

A copy of the independent financial audit of the Program's revenues and expenses can be found in Appendix D.

9 Plan Performance

Table 6 summarizes the Program's key performance measures for 2019, as committed to in the Program Plan and the collection rate target submission to the BCMoECCS dated April 1, 2013, along with actual performance values and strategies for improving performance in 2020.

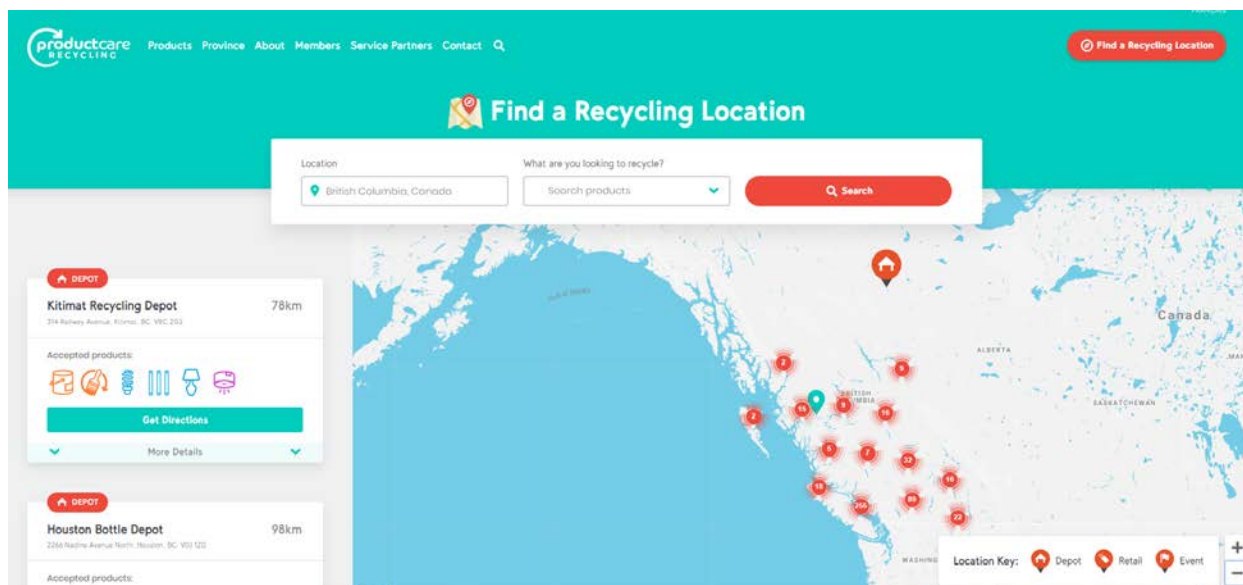
Table 6: 2019 Key Program Measures and Performance

2019 Key Program Measures and Performance	
Part 2 section 8(2)(g)	
2019 Performance	Strategies for Improvement
Approximately 111,186 units collected. (2017 collection target of 28,078 units based on 5% annual increase from 2012 baseline of 22,000 units.)	n/a
As part of SABC, the Program worked with other stewardship programs (e.g. BC Lamps & Lighting Equipment, BC Paint & HHW) to conduct stakeholder outreach. In addition, the Program engaged RCBC for hotline and Recyclepedia services.	The Program will continue to reach out to other organizations and stewardship programs, where synergies exist.
According to an accessibility study conducted by an independent third party in 2019, 99.6% of the provincial population has access to a collection site according to SABC's standard. The total number of collection sites increased by 6 from 2018 to 207 in 2019.	n/a

Appendix A: Communication and Public Outreach Materials

Recycling Locator tool

Below is a snapshot of the recycling locator tools found at productcare.org.



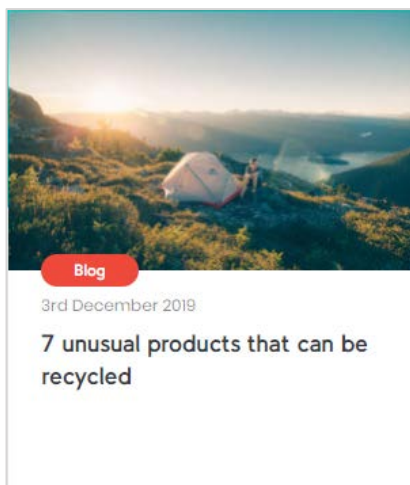
Wallet-sized Card



General Awareness Posters



Website Blog posts




7. Smoke/carbon monoxide (CO) alarms

Did you know, sources say your smoke and CO alarms should be replaced [approximately every decade](#)? Even though your alarm's test button may work past the 10-year mark, they become less sensitive over time. This means they may not be detecting smoke when they need to be! [You can take your broken or expired alarms to nearly 50 locations](#) across British Columbia.



Google Search Ad

Recycle Your Smoke Alarm | Find A Drop-Off Site 
Near You

 www.productcare.org/smoke-alarms

Smoke alarms contain radiation + shouldn't be thrown out.
Here's how to recycle them 200 Locations in BC. Many
Products Accepted. Free to Drop-Off. Open to Everyone.

Google and Spotify Display Ads



Sample Facebook Ad

 **Product Care Recycling**
August 26, 2019 · 🌐

Did you know? Smoke and CO alarms:

- should be checked once a month
- should be cleaned twice a year
- should be replaced every 5-10 years
- shouldn't go in the trash!

Recycle your expired or broken alarms for free across British Columbia.



WWW.PRODUCTCARE.ORG
Recycle Your Smoke Alarm - Find a Recycling Location [Learn More](#)

 **Product Care Recycling**
Published by Alex Barrow [?] · October 7, 2019 · 🌐

Have you checked your smoke or carbon monoxide alarm? Only working smoke alarms save lives. If yours is broken, recycle it!

Find a recycling location at www.productcare.org



PRODUCTCARE.ORG
How to recycle smoke alarms in British Columbia [Learn More](#)

Sample Social Media Post



Municipal Calendar Ad



Static Television Ad

**Recycle your
smoke & carbon
monoxide alarms
for free.**

Find a recycling location
at productcare.org

Print Hand-outs/ Direct Mail

Recycle your old smoke or CO alarms

And help protect our planet!



Find out where to recycle them at productcare.org

productcare
RECYCLING

Take me home and finish this word search!

R E G H E Y B X X K K U F T Q
R E F N T E Y E W E Q M F G I
M E T Y I N Z C C K E K O M S
D D T A A L E M N A S B X F E
I E Z H W B C M U E R M E Y E
J P Y X G H Y Y N Y G B U S L
Q O Z H B I M J C O S R O P C
E T D T E M F E Q E R K E N Y
H L U R E X D E X F R I A M C
H T L A P I F C R W A E V V E
F E M E X M D I D I N O I N R
Q H W O R V T W C D F T M V E
H S N T F L A M E S O G H I S
D O O T V R B T U N N D O B C
M Z F S H N A L A R M E N T I

Alarm Beep Carbon Depot Earth
Emergency Environment Firefighter Flames
Monoxide Recycle Water Smoke

Find your nearest recycling location and a list of accepted products at productcare.org

productcare
RECYCLING

Replace it for your family, recycle it for the earth



Recycle your smoke and carbon monoxide alarms for free across BC

Find a recycling location near you at productcare.org

productcare
RECYCLING

Accepted Alarm Products

- ✓ Smoke alarms
- ✓ Carbon monoxide (CO) alarms
- ✓ Combination smoke/CO alarms

Not Accepted Products

- ✗ Thermostats
- ✗ Alarm keypads
- ✗ Physically damaged smoke alarms
- ✗ Building-wide smoke/CO detector units
- ✗ Smoke detectors without an alarm function

Did you know house fire fatalities may be reduced by half if your smoke alarms are working?¹



If you have a broken or expired smoke or carbon monoxide alarm, replace it and drop it off for free at over 200 recycling locations across BC. Learn more at productcare.org/alarms

Find your nearest recycling location at productcare.org

productcare
RECYCLING

¹<https://www150.statcan.gc.ca/n1/pub/99-011-x/2016001/article/14861-eng.htm>

Appendix B: List of 2019 Program Collection Sites

#	Collection Site Name	City	Regional District
1	7 Mile Landfill and Recycling	Port McNeil	Mt. Waddington
2	Abbotsford Bottle Depot	Abbotsford	Fraser Valley
3	Abbotsford Community Services Recycling	Abbotsford	Fraser Valley
4	Agassiz Bottle Depot Ltd	Agassiz	Fraser Valley
5	Aldergrove Bottle Depot	Aldergrove	Metro Vancouver
6	Alpine Disposal & Recycling	Langford	Capital
7	Augusta Recyclers Ltd.	Powell River	Powell River
8	Barriere Return-It	Barriere	Thompson Nicola
9	Bella Bella Eco Depot	Bella Bella	Central Coast
10	Bella Coola Recycling	Bella Coola	Central Coast
11	Biggar Bottle Depot	Port Coquitlam	Metro Vancouver
12	Bill's Bottle Depot	Salmon Arm	Columbia-Shuswap
13	Bings Creek Solid Waste Management Complex	North Cowichan	Cowichan Valley
14	Border Town Recycling Group	Stewart	Kitimat-Stikine
15	Boucherie Self Storage & Bottle Depot	West Kelowna	Central Okanagan
16	Burns Lake Return-It	Burns Lake	Bulkley-Nechako
17	Campbell Mountain Landfill	Penticton	Okanagan Similkameen
18	Campbell River Waste Management Centre	Campbell River	Strathcona
19	Canadian Tire #437 Campbell River	Campbell River	Strathcona
20	Canadian Tire #438 Williams Lake	Williams Lake	Cariboo
21	Capital City and Sidney Fire Equipment	Sidney	Capital
22	Carney's Waste Systems - Squamish	Squamish	Squamish Lillooet
23	Century Hardware Ltd.	100 Mile House	Cariboo
24	Chasers Bottle Depot	Vernon	North Okanagan
25	Chetwynd Recycling and Bottle Depot	Chetwynd	Peace River
26	Chilliwack Bottle Depot	Chilliwack	Fraser Valley
27	CM Recycling Ltd (formerly Cariboo Metal Recycling)	Quesnel	Cariboo
28	Columbia DB Dease / Columbia Bottle Ent Ltd.	Kelowna	Central Okanagan
29	Columbia DB St Paul / WB 120 LTD	Kelowna	Central Okanagan
30	Comox Valley Waste Management Centre	Cumberland	Comox Valley
31	Coquitlam Return-It Depot	Coquitlam	Metro Vancouver
32	Coquitlam Transfer Station	Coquitlam	Metro Vancouver
33	Courtenay Return-It Depot	Courtenay	Comox Valley
34	Cranbrook Bottle Depot	Cranbrook	East Kootenay
35	Curt Garland Community Support Centre / The Governing Council of the Salvation Army in Canada	Prince George	Fraser Fort George

#	Collection Site Name	City	Regional District
36	D&G Recycling (Tsawwassen Bottle Depot)	Delta	Metro Vancouver
37	D.C. Recycling & Bottle Depot	Dawson Creek	Peace River
38	District of Clearwater	Clearwater	Thompson-Nicola
39	East Hasting Bottle Depot	Burnaby	Metro Vancouver
40	Enderby Return-It Recycling Depot	Enderby	North Okanagan
41	Fernie Bottle Depot	Fernie	East Kootenay
42	Fleetwood Bottle Return Depot	Surrey	Metro Vancouver
43	Fraser Lake Bottle Depot	Fraser Lake	Bulkley-Nechako
44	FSJ Bottle Drop	Fort St. John	Peace River
45	Gabriola Island Recycling	Gabriola Island	Nanaimo
46	Galiano Island Recycling Resources	Galino Island	Capital
47	General Grants Sahali	Kamloops	Thompson Nicola
48	Gibsons Recycling Depot	Gibsons	Sunshine Coast
49	Go Green Depot & Recycling	Vancouver	Metro Vancouver
50	Gold Trail Recycling Ltd.	100 Mile House	Cariboo
51	Golden Landfill	Golden	Columbia Shuswap
52	Grand Forks Bottle Depot	Grand Forks	Kootenay Boundary
53	Habitat for Humanity ReStore – Tillicum	Victoria	Capital
54	Habitat for Humanity ReStore – Uptown	Victoria	Capital
55	Habitat for Humanity ReStore – Westshore	Victoria	Capital
56	Happy Stan's Recycling Services Ltd.	Port Coquitlam	Metro Vancouver
57	Hartland Landfill Recycling Depot	Victoria	Capital
58	Heiltsuk Environmental Bella Bella Eco-Depot	Bella Bella	Central Coast
59	Home Hardware Cranbrook	Cranbrook	East Kootenay
60	Home Hardware Grand Forks	Grand Forks	Kootenay Boundary
61	Home Hardware Merritt	Merritt	Thompson-Nicola
62	Home Hardware Revelstoke	Revelstoke	Columbia-Shuswap
63	Home Hardware Shepherds	Armstrong	North Okanagan
64	Home Hardware Smithers	Smithers	Bulkley-Nechako
65	Home Hardware Sooke	Sooke	Capital
66	Houston Bottle Depot	Houston	Bulkley-Nechako
67	Interior Freight & Bottle	Vernon	North Okanagan
68	Invermere Fire Department	Invermere	East Kootenay
69	Island Return It Recycling - CAMPBELL RIVER	Campbell River	Strathcona
70	Island Return It Recycling - DUNCAN	Duncan	Cowichan Valley
71	Island Return It Recycling - ESQUIMALT	Esquimalt	Capital
72	Island Return It Recycling - SIDNEY	Sidney	Capital
73	Island Return-It South Cowichan	Cobble Hill	Cowichan Valley

#	Collection Site Name	City	Regional District
74	Island Solid Waste Management	Port Clements	Skeena-Queen Charlotte
75	J&C Bottle Depot	Penticton	Okanagan Similkameen
76	Joe's Bottle Depot	Vancouver	Metro Vancouver
77	Junction Bottle Depot	Ladysmith	Cowichan Valley
78	Kamloops Fire Rescue	Kamloops	Thompson-Nicola
79	Kaslo Building Supplies	Kaslo	Central Kootenay
80	Keremeos Landfill	Keremeos	Okanagan Similkameen
81	KUTE-Kitimat Recycling Depot	Kitimat	Kitimat-Stikine
82	Ladner Bottle Depot	Delta	Metro Vancouver
83	Langley Bottle Depot	Langley	Metro Vancouver
84	London Drugs #10	Vancouver	Metro Vancouver
85	London Drugs #11	Richmond	Metro Vancouver
86	London Drugs #12	Kelowna	Central Okanagan
87	London Drugs #14	Victoria	Capital
88	London Drugs #15	Coquitlam	Metro Vancouver
89	London Drugs #16	Abbotsford	Fraser Valley
90	London Drugs #17	Delta	Metro Vancouver
91	London Drugs #18	Langley	Metro Vancouver
92	London Drugs #19	Vancouver	Metro Vancouver
93	London Drugs #2	Vancouver	Metro Vancouver
94	London Drugs #25	Burnaby	Metro Vancouver
95	London Drugs #28	Vancouver	Metro Vancouver
96	London Drugs #29	Victoria	Capital
97	London Drugs #3	New Westminster	Metro Vancouver
98	London Drugs #35	Kamloops	Thompson-Nicola
99	London Drugs #36	Nanaimo	Nanaimo
100	London Drugs #37	Delta	Metro Vancouver
101	London Drugs #39	Vernon	North Okanagan
102	London Drugs #4	Vancouver	Metro Vancouver
103	London Drugs #41	Chilliwack	Fraser Valley
104	London Drugs #42	South Surrey	Metro Vancouver
105	London Drugs #44	West Vancouver	Metro Vancouver
106	London Drugs #46	Victoria	Capital
107	London Drugs #47	Maple Ridge	Metro Vancouver
108	London Drugs #5	North Vancouver	Metro Vancouver
109	London Drugs #50	Vancouver	Metro Vancouver
110	London Drugs #51	Prince George	Fraser-Fort George

#	Collection Site Name	City	Regional District
111	London Drugs #52	Richmond	Metro Vancouver
112	London Drugs #53	Vancouver	Metro Vancouver
113	London Drugs #54	Victoria	Capital
114	London Drugs #55	Mission	Fraser Valley
115	London Drugs #56	Burnaby	Metro Vancouver
116	London Drugs #6	Burnaby	Metro Vancouver
117	London Drugs #61	Gibsons	Sunshine Coast
118	London Drugs #67	Courtenay	Comox Valley
119	London Drugs #7	Vancouver	Metro Vancouver
120	London Drugs #70	Penticton	Okanagan Similkameen
121	London Drugs #71	Burnaby	Metro Vancouver
122	London Drugs #72	Nanaimo	Nanaimo
123	London Drugs #73	Campbell River	Strathcona
124	London Drugs #74	Vancouver	Metro Vancouver
125	London Drugs #75	Surrey	Metro Vancouver
126	London Drugs #76	Westbank	Central Okanagan
127	London Drugs #77	Duncan	Cowichan Valley
128	London Drugs #78	Vancouver	Metro Vancouver
129	London Drugs #8	Surrey	Metro Vancouver
130	London Drugs #80	Squamish	Squamish Lillooet
131	London Drugs #81	Surrey	Metro Vancouver
132	London Drugs #82	Vancouver	Metro Vancouver
133	London Drugs #85	Abbotsford	Fraser Valley
134	London Drugs #9	Surrey	Metro Vancouver
135	Lone Butte Supply	100 Mile House	Cariboo
136	Lougheed Return-It Depot	Coquitlam	Metro Vancouver
137	Make/Do (formerly New Life Furniture and Recycling)	Creston	Central Kootenay
138	Mayne Island Recycling Society	Mayne Island	Capital
139	Meade Creek Recycling Drop-Off Depot	Lake Cowichan	Cowichan Valley
140	Mission Recycling Depot	Mission	Fraser Valley
141	Nelson Home Hardware Building Centre	Nelson	Central Kootenay
142	New & Nearly New	Kimberley	East Kootenay
143	Newton Bottle Depot	Surrey	Metro Vancouver
144	North Shore Bottle Depot	North Vancouver	Metro Vancouver
145	North Van Bottle Depot	North Vancouver	Metro Vancouver
146	Oak Bay Recycling Depot	Victoria	Capital
147	Okanagan Falls Landfill	Okanagan Falls	Okanagan Similkameen
148	Oliver Sanitary Landfill	Oliver	Okanagan Similkameen

#	Collection Site Name	City	Regional District
149	Osoyoos Bottle Depot	Osoyoos	Okanagan Similkameen
150	Ouellette Bros. Building Supplies Ltd	Fort St James	Bulkley Nechako
151	Panorama Village Return-It	Surrey	Metro Vancouver
152	Parksville Bottle & Recycling Depot	Parksville	Nanaimo
153	Parksville Home Hardware	Parksville	Nanaimo
154	Peerless Road Recycling Depot	Ladysmith	Cowichan Valley
155	Pender Island Recycling Society	Pender Island	Capital
156	PG Recycling (formerly BBK Bottle Depot)	Prince George	Fraser-Fort George
157	Planet Earth Recycling Ltd.	West Kelowna	Central Okanagan
158	Port Alberni Recycling Depot (Sun Coast Waste Services)	Port Alberni	Alberni-Clayoquot
159	Port Hardy Return-it	Port Hardy	Mount Waddington
160	Powell Street Return-It Bottle Depot	Vancouver	Metro Vancouver
161	Princeton Return-It Depot	Princeton	Okanagan Similkameen
162	Quality Glass Ltd.	Ashcroft	Thompson-Nicola
163	Queensborough Landing Return-It	New Westminster	Metro Vancouver
164	Recycle-It Resource Recovery	Fort St John	Peace River
165	Regional Recycling Abbotsford	Abbotsford	Fraser Valley
166	Regional Recycling Burnaby	Burnaby	Metro Vancouver
167	Regional Recycling Cloverdale	Surrey	Metro Vancouver
168	Regional Recycling - Hayes (Nanaimo)	Nanaimo	Nanaimo
169	Regional Recycling - Old Victoria (Nanaimo)	Nanaimo	Nanaimo
170	Regional Recycling Prince Rupert	Prince Rupert	Skeena-Queen Charlotte
171	Regional Recycling Richmond	Richmond	Metro Vancouver
172	Regional Recycling Vancouver	Vancouver	Metro Vancouver
173	Regional Recycling Whistler	Whistler	Squamish Lillooet
174	Revelstoke Landfill	Revelstoke	Columbia Shuswap
175	Ridge Meadows Recycling Society	Maple Ridge	Metro Vancouver
176	RONA (Alert Bay)	Alert Bay	Mount Waddington
177	RONA (Penticton)	Penticton	Okanagan Similkameen
178	RONA Home Centre (Hope)	Hope	Fraser Valley
179	Salmon Arm Landfill	Salmon Arm	Columbia Shuswap
180	Salt Spring Island Recycling Depot	Saltspring Island	Capital
181	Salvation Army Langley	Langley	Metro Vancouver
182	Sardis Bottle Depot	Chilliwack	Fraser Valley
183	Scotch Creek Bottle Depot	Scotch Creek	Columbia-Shuswap
184	Scott Road Bottle Depot	Surrey	Metro Vancouver

#	Collection Site Name	City	Regional District
185	Semiahmoo Bottle Depot	Surrey	Metro Vancouver
186	South Van Bottle Depot	Vancouver	Metro Vancouver
187	Steveston Return-It Depot	Richmond	Metro Vancouver
188	Summerland Sanitary Landfill	Summerland	Okanagan Similkameen
189	T-2 Market	Oliver	Okanagan Similkameen
190	The Battery Doctors	Kelowna	Central Okanagan
191	The City of New Westminster Recycling	New Westminster	Metro Vancouver
192	The Hut Bottle Depot	Princeton	Okanagan Similkameen
193	Thornhill Fire Department	Terrace	Kitimat-Stikine
194	Thorsen Creek Recycling Depot	Bella Coola	Central Coast
195	Trail Bay Hardware	Sechelt	Sunshine Coast
196	Trail Bottle Depot	Trail	Kootenay Boundary
197	Ucluelet Bottle Depot	Ucluelet	Alberni-Clayoquot
198	Valemount Recycling Centre	Valemount	Fraser-Fort George
199	Venture Training Vernon	Vernon	North Okanagan
200	Village of Gold River	Gold River	Strathcona
201	Village of Montrose	Montrose	Kootenay Boundary
202	Walnut Grove Bottle Depot	Langley	Metro Vancouver
203	Wesbrook Community Centre	Vancouver	Metro Vancouver
204	Westcoast Hardware	Port Alberni	Alberni-Clayoquot
205	White Rock Return-it Depot	Surrey	Metro Vancouver
206	Wide Sky Disposal	Fort Nelson	Northern Rockies
207	Willowbrook Recycling Depot	Langley	Metro Vancouver

Appendix C: 2019 Breakdown of Collection Sites by Regional District

Regional District	# of Collection Sites
Alberni-Clayoquot	3
Bulkley-Nechako	5
Capital	18
Cariboo	5
Central Coast	3
Central Kootenay	3
Central Okanagan	7
Columbia-Shuswap	6
Comox Valley	3
Cowichan Valley	7
East Kootenay	5
Fraser-Fort George	4
Fraser Valley	12
Kitimat-Stikine	3
Kootenay Boundary	4
Metro Vancouver	65
Mount Waddington	3
Nanaimo	7
North Okanagan	6
Northern Rockies	1
Okanagan-Similkameen	11
Powell River	1
Qathet	5
Skeena-Queen Charlotte	2
Squamish Lillooet	3
Strathcona	5
Sunshine Coast	3
Thompson-Nicola	7
Total	207

Appendix D: 2019 Audited Financial Statements

**PRODUCT CARE ASSOCIATION OF CANADA
BC SMOKE AND CARBON MONOXIDE
(CO) ALARMS PROGRAM**

STATEMENT OF REVENUES AND EXPENSES

31 DECEMBER 2019

**PRODUCT CARE ASSOCIATION OF CANADA
BC SMOKE AND CARBON MONOXIDE (CO) ALARMS PROGRAM
Statement of Revenues and Expenses
For the year ended 31 December 2019**

Contents

Independent Auditors' Report	
Statement of Revenues and Expenses	5
Notes to the Statement of Revenues and Expenses	6 - 7



ROLFE, BENSON LLP

CHARTERED PROFESSIONAL ACCOUNTANTS

1500 – 1090 West Georgia Street
Vancouver, B.C. V6E 3V7
Tel: 604-684-1101 Fax: 604-684-7937
E-mail: admin@rolfebenenson.com

INDEPENDENT AUDITORS' REPORT

To: BC Ministry of Environment,

Report on the Audit of the Statement of Revenues and Expenses

Opinion

As required by the British Columbia Environmental Management Act, Recycling Regulation 8(2)(f)(ii), we have audited the Statement of Revenues and Expenses of the BC Smoke and Carbon Monoxide (CO) Alarms Program (the "Statement") as reported by Product Care Association of Canada (the "Association") for the year ended 31 December 2019 and a summary of significant accounting policies and other explanatory information.

In our opinion, the Statement presents fairly, in all material respects, the revenues and expenses of the BC Smoke and Carbon Monoxide (CO) Alarms Program for the year ended 31 December 2019 in accordance with Canadian accounting standards for not-for-profit organizations.

Basis for Opinion

We conducted our audit in accordance with Canadian generally accepted auditing standards. Our responsibilities under those standards are further described in the Auditors' Responsibilities section of our report. We are independent of the Association in accordance with the ethical requirements that are relevant to our audit of the Statement in Canada, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Other Matter - Restriction on Distribution and Use

This report is prepared on the direction of Product Care Association of Canada's management and the BC Ministry of Environment. As a result, the report may not be suitable for another purpose. Our report is intended solely for Product Care Association of Canada's management and the BC Ministry of Environment and should not be distributed to other parties.

Responsibilities of Management and Those Charged with Governance for the Statement

Management is responsible for the preparation and fair presentation of the Statement in accordance with Canadian accounting standards for not-for-profit organizations and for such internal control as management determines is necessary to enable the preparation of Statement that is free from material misstatement, whether due to fraud or error.



INDEPENDENT AUDITORS' REPORT - continued

In preparing the Statement, management is responsible for assessing the Association's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Association or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Association's financial reporting process.

Auditors' Responsibilities

Our objectives are to obtain reasonable assurance about whether the Statement as a whole is free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Canadian generally accepted auditing standards will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of this Statement.

As part of an audit in accordance with Canadian generally accepted auditing standards, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the Statement, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Association's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Association's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the Statement or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Association to cease to continue as a going concern.



ROLFE, BENSON LLP

CHARTERED PROFESSIONAL ACCOUNTANTS

INDEPENDENT AUDITORS' REPORT - continued

- Evaluate the overall presentation, structure and content of the Statement, including the disclosures, and whether the Statement represents the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Rolfe, Benson LLP

CHARTERED PROFESSIONAL ACCOUNTANTS

Vancouver, Canada
16 April 2020

**PRODUCT CARE ASSOCIATION OF CANADA
BC SMOKE AND CARBON MONOXIDE (CO) ALARMS PROGRAM**
Statement of Revenues and Expenses
For the year ended 31 December 2019

	2019	2018
Revenues	\$ 749,439	\$ 714,225
Program expenses		
Processing	449,632	303,094
Collection	67,458	68,304
Administration (Note 2(c))	59,592	42,104
Transportation	58,325	42,681
Communications	46,602	26,334
	<u>681,609</u>	<u>482,517</u>
Excess of revenues over expenses for the year	\$ 67,830	\$ 231,708
Commitment (Note 3)		

The accompanying notes are an integral part of this statement of revenues and expenses.

PRODUCT CARE ASSOCIATION OF CANADA
BC SMOKE AND CARBON MONOXIDE (CO) ALARMS PROGRAM
Notes to the Statement of Revenues and Expenses
For the year ended 31 December 2019

1. Basis of Presentation

The Statement of Revenues and Expenses (the "Statement") only includes the revenues and expenses related to the BC Smoke and Carbon Monoxide (CO) Alarms Program (the "Program"), a segment of the operations of Product Care Association of Canada (the "Association").

2. Summary of Significant Accounting Policies

The Statement is prepared in accordance with Canadian accounting standards for not-for-profit organizations. The significant policies are detailed as follows:

(a) Revenue Recognition

Environmental Handling Fees are received from members of the Association making sales of designated program materials within the province of British Columbia. The Association recognizes these fees as revenue when received or receivable if the amount to be received can be reasonably estimated and collection is reasonably assured. Environmental Handling Fees revenues are recognized as individual members report and remit them as required by the Association's membership agreement which is at the end of the month following the reporting period that the designated program materials were sold by the member.

Members are obligated to remit Environmental Handling Fees for all products sold from the earlier of the programs' start date or the date when member started selling obligated products. If, for any reason, a member omits reporting and remitting Environmental Handling Fees associated with sold program products, the Association will recognize those Environmental Handling Fees as revenue when the amounts are determinable by the Association.

(b) Use of Estimates

The preparation of financial statements in accordance with Canadian accounting standards for not-for-profit organizations requires management to make estimates and assumptions that affect the reported amounts of revenues and expenses and disclosure of contingencies included in the Statement. Accounts subject to estimates include revenue accruals, expense accruals, overhead allocation and processing commitments. Actual results could differ from those estimates.

(c) General and Administrative Expenses - Overhead Allocation

A portion of the total general and administrative expenses of the Association, net of expense recoveries, has been allocated to the Program. The allocation of general and administrative expenses to the Program is determined using the percentage of program specific operating expenses as compared to total operating expenses for all the Association's programs. Included in administration expense is \$40,741 (2018 - \$30,021) of overhead expense which has been allocated to the Program.

PRODUCT CARE ASSOCIATION OF CANADA
BC SMOKE AND CARBON MONOXIDE (CO) ALARMS PROGRAM
Notes to the Statement of Revenues and Expenses
For the year ended 31 December 2019

3. Processing Commitment

At year end, the Association had unprocessed program materials on hand related to the Program with an estimated cost to process, transport and recycle of \$68,813 (2018 - \$173,778) which will be incurred in 2020.

Appendix E: 2019 Independent Non-Financial Audit

PRODUCT CARE ASSOCIATION OF CANADA

**BC SMOKE AND CARBON MONOXIDE (CO)
ALARMS PROGRAM**

**INDEPENDENT REASONABLE
ASSURANCE REPORT**

31 DECEMBER 2019



1500 – 1090 West Georgia Street
Vancouver, B.C. V6E 3V7
Tel: 604-684-1101 Fax: 604-684-7937
E-mail: admin@rolfebenson.com

INDEPENDENT REASONABLE ASSURANCE REPORT

To the Directors of
Product Care Association of Canada,

Assurance Level and Selected Information

We have been engaged by Product Care Association of Canada (the “Association”) to perform a reasonable assurance engagement in respect of the following information (the “Selected Information”) detailed in Appendix 1, and also included within the Association’s Annual Report for the BC Smoke and Carbon Monoxide (CO) Alarms (“AlarmRecycle”) Program to the British Columbia Ministry of Environment and Climate Change Strategy for the year ended 31 December 2019:

- Section 4 - Collection System and Facilities and Appendix B - the location of collection facilities, and any changes in the number and location of collection facilities from the previous report in accordance with Section 8(2)(b) of BC Regulation 449/2004 (the “Recycling Regulation”);
- Section 6 - Pollution Prevention Hierarchy and Product/Component Management - the description of how the recovered product was managed in accordance with the pollution prevention hierarchy under Section 8(2)(d) of the Recycling Regulation;
- Section 7 - Product Collected - the description of how total amounts of the producer’s product collected has been calculated in accordance with Section 8(2)(e) of the Recycling Regulation; and
- Section 9 - Plan Performance – the description of performance for the year in relation to targets in the approved stewardship plan under Section 8(2)(b), (d) and (e) of the Recycling Regulation.

Our reasonable assurance engagement does not constitute a legal determination on the Association’s compliance with Sections 8(2)(b), (d) and (e) of the Recycling Regulation.



Responsibilities

Preparation and fair presentation of the Selected Information in accordance with the evaluation criteria as listed in Appendix 1 is the responsibility of the Association's management. Management is also responsible for such internal control as management determines is necessary to enable the preparation of the Selected Information such that it is free from material misstatement. Furthermore management is responsible for preparation of suitable evaluation criteria in accordance with the Recycling Regulation Guidance - Third Party Assurance for Non-Financial Information in Annual Reports - 2019 Reporting Year dated November 2019 as specified by the Director under section 8(2)(h) of the Recycling Regulation of the Province of British Columbia.

Our responsibility is to express an opinion on the Selected Information based on the procedures we have performed and the evidence we have obtained.

Evaluation Criteria

The evaluation criteria presented in Appendix 1 are an integral part of the Selected Information and address the relevance, completeness, reliability, neutrality and understandability of the Selected Information.

Applicable Quality Control Requirements

We apply Canadian Standard on Quality Control 1 and, accordingly, maintain a comprehensive system of quality control, including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Scope of the Reasonable Assurance Engagement

We carried out our reasonable assurance engagement in accordance with the International Standard on Assurance Engagements 3000 (ISAE 3000) published by the International Federation of Accountants. This Standard requires that we comply with independence requirements and plan and perform the engagement to obtain reasonable assurance about whether the Selected Information is free of material misstatement.

A reasonable assurance engagement includes examining, on a test basis, evidence supporting the amounts and disclosures within the Selected Information. The procedures selected depend on our judgement, including the assessment of the risks of material misstatement in the Selected Information due to omissions, misrepresentations and errors. In making those risk assessments, we consider internal control relevant to the entity's preparation and fair presentation of the Selected Information in order to design assurance procedures that are appropriate in the circumstances, but not for the purpose of expressing a conclusion on the effectiveness of the entity's internal control. A reasonable assurance engagement also includes assessing the evaluation criteria used and significant estimates made by management, as well as evaluating the overall presentation of the Selected Information. The main elements of our work were:

- Gain an understanding of the data collection, monitoring and reporting processes through inquiries of management;
- Testing the processes, documents and records on a sample basis;
- Re-calculating quantitative data on a sample basis as it pertains to the Selected Information; and
- Evaluation the presentation of the Selected Information in the Annual Report.



We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Inherent Limitations

Non-financial performance information is subject to more inherent limitations than financial information, given the characteristics of the Selected Information and the methods used for determining and calculating such information. Qualitative interpretations of relevance, materiality and the accuracy of data are subject to individual assumptions and judgments. Furthermore, the nature and methods used to determine such information, as well the evaluation criteria and the precision thereof, may change over time. It is important to read our report in the context of the evaluation criteria.

Conclusion

In our opinion, the Selected Information within Product Care Association of Canada's Annual Report for the BC Smoke and Carbon Monoxide (CO) Alarms Program for the year ended 31 December 2019 presents fairly in accordance with the evaluation criteria, in all material respects:

- The location of collection facilities, and any changes in the number and location of collection facilities from the previous report in accordance with Section 8(2)(b) of the Recycling Regulation;
- The description of how the recovered product was managed in accordance with the pollution prevention hierarchy under Section 8(2)(d) of the Recycling Regulation;
- The description of how total amounts of the producer's product collected has been calculated in accordance with Section 8(2)(e) of the Recycling Regulation; and
- The description of performance for the year in relation to targets in the approved stewardship plan under Section 8(2)(b), (d) and (e) of the Recycling Regulation.

Emphasis of Matter

Without qualifying our opinion, the following should be noted regarding the information contained in the Annual Report:

1. The Selected Information included in Section 6 - Pollution Prevention Hierarchy and Product/Component Management is determined based on supporting documentation and survey responses from the primary processors. Hazardous materials are not tracked on shipping manifests until radioactive alarms are broken into sub-components and the radioactive material is sent from the primary processors to a secondary storage facility. For one of the primary processors, this process is completed in the United States and falls under the US Environmental Protection Agency standards. No shipping documents have been reviewed to ensure these standards have been met. The second primary processor is located outside of B.C. Due to this, no B.C. hazardous waste manifests were available to verify the final disposition of these materials. As such, there is uncertainty surrounding the Selected Information contained in the Pollution Prevention Hierarchy section of Appendix 1.



2. The amount of product sold and recovery rate was not included in the scope of the Selected Information. Given the small number of manufacturers of these products selling into the B.C. market, it was approved by the Ministry of Environment that aggregated sales data would not be made publicly available in the Annual Report. As the Association is not required to report sales data, the recovery rate has also been excluded from the scope of the Selected Information as sales data forms part of this calculation.

Other Matter

Our report has been prepared solely for the purposes of management's stewardship under the Recycling Regulation and is not intended to be and should not be used for any other purpose. Our duties in relation to this report are owed solely to the Association, and accordingly, we do not accept any responsibility for loss occasioned to any other party acting or refraining from acting based on this report.

Rolfe, Benson LLP

CHARTERED PROFESSIONAL ACCOUNTANTS

Vancouver, Canada
23 June 2020

Appendix 1

Evaluation Criteria

Collection facilities

Specific disclosures in the annual stewardship report from Section 4 - Collection System and Facilities for which evaluation criteria were developed	
Disclosure per Annual Report	Reference
Total number of collection facilities – 207	Table 1: Collection Site by Type (2018 and 2019) Appendix B – List of 2019 Program Collection Sites
Change in the number of collection facilities in 2019 – “Seven collection sites were added and one collection site was removed during 2019”	

The following evaluation criteria were applied to the assessment of the location of collection facilities, and any changes in the number and location of collection facilities from the previous report in accordance with Section 8(2)(b) of the Recycling Regulation:

- “Collection facilities” are depots that have a signed contract with the Association for the collection of program materials during the reporting period: 1 January – 31 December 2019, a physical location that is available to collect program materials and the staff of the facility has an adequate understanding of the program.
- The Association maintains a listing of all collection facilities for the program, including the location of the collection facility, the total of which agrees to the number of collection facilities as disclosed in the Annual Report.
- Large volume end users (LVEU’s) are excluded from the number of collection facilities.
- The change in number of collection facilities is calculated by comparing the current number of collection facilities, a sum of all the collection facilities that have a signed contract within a given reporting year and those that closed within the same reporting year, to the number of collection facilities reported in the prior reporting year.

Pollution prevention hierarchy

Specific disclosures in the annual stewardship report from Section 6 - Pollution Prevention Hierarchy and Product/Component Management for which evaluation criteria were developed	
Disclosure per Annual Report	Reference
“The following is based on information provided by the Program’s downstream processors, where available, or based on the understanding of the service agreement with the downstream processors.”	
Alarm Type: Radioactive Alarms Sub-component: Radioactive cells End fate: 100% of product recovered stored at licensed long-term storage facility Sub-component: Plastic End fate: 100% of product recovered recycled Sub-component: Metal End fate: 100% of product recovered recycled	Table 2: Product / Component Management

<p>Alarm Type: Photovoltaic (non-radioactive alarms) Sub-component: Plastic End fate: 100% of product recovered recycled</p> <p>Sub-component: Metal End fate: 100% of product recovered recycled</p> <p>“Some of the alarms collected in 2019 were not shipped for processing until the subsequent year. Statements regarding the end fate of alarms are in reference to materials processed in 2019 only.”</p> <p>“Based on information provided in end fate surveys completed by the Program’s primary processors.”</p>	
<p>“According to information obtained from end fate surveys completed by the downstream processors, the plastic and metal components are separated and sent for recycling and the Am-241 foil is shipped for long-term storage at a licensed radioactive waste facility.”</p>	

The following evaluation criteria were applied to the assessment of how the recovered product is managed in accordance with the pollution prevention hierarchy in accordance with Section 8(2)(d) of the Recycling Regulation:

- The Association maintains a listing of all products shipped to the primary processors which is supported by shipping documents or processor invoices.
- One of the program’s primary processors provides documents indicating the amounts of Am-241 collected, the other processor provides documentation showing shipments of Am-241 to the downstream processor.
- The processors provide information on product management in an annual questionnaire.
- The Association performs periodic site inspections of the processors’ facilities. Site inspection criteria have been developed to confirm the responses in the questionnaire provided by the primary processor. Site inspections were performed for both primary processors in 2016. Following the initial site inspections in 2016, a site inspection was performed for one of the processors during 2019.

Product collected

Specific disclosures in the annual stewardship report from Section 7 - Product Collected for which evaluation criteria were developed	
Disclosure per Annual Report	Reference
# of alarms collected – in small containers 96,535 # of alarms collected – in mega bags 14,651	Table 3: Units Collected, January 1 – December 31, 2019
<p>“The number of alarms collected in small containers (boxes and totes) and mega-bags was estimated by multiplying the number of small containers and mega-bags collected during the year by a conversion factor of 43 alarms per small container and 1,127 alarms per mega-bag. The conversion factors were calculated by averaging the units of alarms from more than 2,200 small collection containers and 13 mega-bags, which were sorted and counted in 2019 at Product Care’s facility.”</p>	

The following evaluation criteria were applied to the assessment of the description of how total amounts of the producer's product collected has been calculated in accordance with Section 8(2)(e) of the Recycling Regulation:

- The Association maintains a listing of product collected by product category for the fiscal year which agrees to the amounts disclosed in the Annual Report.
- Each shipment of product collected is supported by documentation indicating the total number of small containers or mega bags collected and the type of program materials collected which has been agreed upon by the shipper, receiver and carrier.
- The calculation of the number of alarms in small containers is determined using the total number of small containers sorted during the year and converting to units using the average number of units per boxes. The average number of units per box is determined by counting the contents of a sample of small containers received during the year.
- The number of alarms collected in mega bags is determined using the total number of mega bags sorted during the year and converting to units using the average number of units per mega bag. The average number of units per mega bag is determined by counting the contents of a sample of mega bags received during the year.
- The Association is not required to present product sold or a recovery rate in the Annual Report. Given the small number of manufacturers of these products selling into the B.C. market, it was approved by the BC Ministry of Environment and Climate Change Strategy that aggregated sales data would not be made publicly available in the Annual Report.

Performance targets

Specific disclosures in the annual stewardship report from Section 9 – Plan Performance for which evaluation criteria were developed	
Disclosure per Annual Report	Reference
Target – units collected 2019 Assertion – Target exceeded: Approximately 111,186 units collected	Table 6: 2019 Key Program Measures and Performance

The following evaluation criteria were applied to the assessment of the description of performance for the year in relation to targets in the approved stewardship plan under Section 8(2)(b), (d) and (e) of the Recycling Regulation:

- All stewardship plan targets relating to Section 8(2)(b), (d) and (e) of the Recycling Regulation have been identified and reported on by management in the Annual Report.
- The description of progress against targets to date is supported by records of progress maintained by the Association.