



October 17, 2025

Outdoor Power Equipment Institute of Canada
130 Adelaide Street West, Suite 701
Toronto, ON
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Dear Brandon Martin:

Thank you for submitting the British Columbia Extended Producer Responsibility Plan for Electric Outdoor Power Equipment (the “plan”) initially on August 7, 2024, in fulfillment of the requirements of Part 2, Section 6 of the [Recycling Regulation](#) (the “regulation”) made under the [Environmental Management Act](#). Outdoor Power Equipment Institute of Canada (OPEIC) re-submitted an updated plan for approval on June 16, 2025. The most recent revision of the plan submitted by OPEIC on September 11, 2025, is attached to this letter.

I acknowledge the efforts of OPEIC and the ongoing dialogue between OPEIC and the Extended Producer Responsibility (EPR) section staff to develop revisions and improvements to the plan to better meet the requirements of the regulation.

Under the regulation, the director, otherwise known as the Statutory Decision Maker (SDM), has the ability to approve an extended producer responsibility plan submitted under section 4. I have completed my review of the submitted plan and OPEIC’s revisions of the plan in response to the proposed amendments as outlined in my preliminary decision letter of July 28, 2025.

Prior to the issuance of this decision letter, OPEIC was provided with feedback on the proposed plan amendments and has had the opportunity to propose further amendments or provide additional information for consideration. I have considered the further amendments and accompanying rationale proposed by OPEIC, and I am satisfied that they have addressed the deficiencies identified in the plan, as outlined in the preliminary decision letter. Please be advised that, pursuant to section 5(5) of the regulation, I hereby approve the plan submitted on September 11, 2025 and enclosed with this letter.

Ministry Expectations

The ministry expects continuous improvement across all future plans and amendments submitted by OPEIC. The following expectations are provided for OPEIC's consideration for future amendments to the plan:

A. Paying the Cost

Please note that the ministry has updated guidance documents for producers paying the cost, [Paying the Costs under Recycling Regulation Section 5\(1\)\(c\)\(i\) and Dispute Resolution Guidance 2024](#). For future plan reviews, it is expected that OPEIC follows the updated guidance to ensure the compensation rate methodology is presented as the steps taken/methods used, (e.g., step-by-step process for determining costs, what happens at each step of the process, what variables are included in the compensation rate methodology, etc.) which will allow interested parties to determine implications to their interests.

B. Consumer Awareness

For future plan reviews, it is expected that OPEIC demonstrate continuous improvement in consumer awareness. I note that the consumer awareness target set at 70% has not increased from the previously approved EPR plan. Commitment to continuous improvement can be demonstrated by taking additional actions and strategies to consistently meet the consumer awareness target established in the plan, by setting progressively higher general awareness targets over time, or by conducting research into additional awareness actions that would increase the efficacy of the current approach to consumer awareness.

C. Recovery Rate or Suitable Alternatives

It is recognized that estimating a recovery rate by accounting for the amount of product collected against the amount sold poses some challenges. However, adequate assessment of the program's performance and reporting each year are requirements of Sections 5 and 8 of the regulation. Further, OPEIC currently reports units sold and units collected.

For future plan iterations, it is expected that OPEIC will commit to complete a study determining the feasibility of calculating a recovery rate/capture rate or propose a suitable alternative to recovery rate/capture rate to better assess overall program performance.

D. Recycling Efficiency Rates (RER)

Recycling Efficiency Rates (RER) targets are important to strive for, to ensure continuous improvement and to reduce environmental impacts of the program pursuant to Part 2, Section 5(1)(c)(vii) of the regulation.

For the next plan renewal, it is expected that OPEIC report RERs and RER targets by battery chemistry for each chemistry type that is managed. Reporting on RERs and RER targets allows for the assessment of recycling performance with respect to the batteries found in OPEIC's products.

E. Collections

The plan states in section 6.3 that "With the active contracted service provider, OPEIC will periodically review the methodologies over the coming years and determine the most suitable approach for calculating estimated units collected." For the next plan renewal, it is expected that OPEIC will include the revised program product unit estimation methodology.

Reporting Expectations

Please be advised, under Part 2, Section 8(2)(h) of the regulation, the director can specify any other information required in the annual report. To ensure the continuity of all performance measures, performance requirements, and targets in the plan, reporting on each of these metrics will be maintained until they are superseded by an approved plan renewal.

The ministry expects this approval letter to be forwarded to OPEIC's board of directors as well as its member producers, since each producer is responsible for ensuring its agent fulfills the plan, and compliance proceedings may be taken against a producer if the agent fails to implement the plan.

Third Party Assurance for Non-Financial Information in Annual Reports

Third party assurance for non-financial information in Annual Reports is required through Section 8(2)(h) of the regulation. The assurance report should be completed annually in accordance with the document entitled, "Third party assurance for non-financial information in annual reports" dated 2024 and revised from time to time, which is enclosed.

Next Plan Review Due Date

Section 6 of the regulation requires a plan review every five years. As per this requirement, OPEIC must review its approved plan, consult on the plan, and submit proposed amendments to the director, or notify the director in writing that no amendments to the plan are necessary, by

April 20, 2027. Guidance on this process can be found on the Extended Producer Responsibility webpage at: [Extended Producer Responsibility - Province of British Columbia \(gov.bc.ca\)](https://www2.gov.bc.ca/gov/content/industry/extended-producer-responsibility).

Right to appeal

If you disagree with this decision, Division 2 of Part 8 of the *Environmental Management Act* provides for appeal of my decision to the Environmental Appeal Board (EAB). In accordance with the *Act* and with the Environmental Appeal Board Procedures regulation, the EAB must receive notice of the appeal no later than 30 days after the date you receive this decision. For further information, please contact the Environmental Appeal Board at (250) 387-3464.

Thank you for your efforts on this plan, and I appreciate OPEIC's continued commitment to achieving compliance in this regard. If you have any questions regarding the implementation of the plan, please contact me at Andreas.Wins-Purdy@gov.bc.ca or through the Extended Producer Responsibility inbox at ExtendedProducerResponsibility@gov.bc.ca.

Sincerely,



Andreas Wins-Purdy, P.Ag.
Director, Extended Producer Responsibility, Program Delivery
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cc:

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Enclosure:

- the British Columbia Extended Producer Responsibility Plan for Electric Outdoor Power Equipment, submitted September 11, 2025
- Third party assurance for non-financial information in annual reports, 2024



British Columbia Extended Producer Responsibility Plan for Electric Outdoor Power Equipment



Submitted to:

**Director, Extended Producer Responsibility
Environmental Standards Branch**

BC Ministry of Environment and Parks
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Program Plan renewal submitted:

August 7, 2024

Revised submission:

June 16, 2025

www.opeic.ca

Executive Summary

The Outdoor Power Equipment Institute of Canada (OPEIC) Extended Producer Responsibility Plan (“Program Plan”) addresses the end-of-life management of electrical outdoor power equipment (EOPE) products captured under Schedule 3, section 2(1)(d) (“Electronic and Electrical Product Category”) of the BC Recycling Regulation B.C. Reg. 449/2004 (O.C. 995/2004) (“Regulation”). EOPE is a broad category of products classified into four sub-categories: hand-held EOPE, walk-behind EOPE, free-standing EOPE and lawn tractors. This plan replaces both the OPEIC Extended Producer Responsibility Plan approved on April 20, 2012, and the amended plan which was approved on July 30, 2020.

OPEIC assists its participants in providing end-of-life product management by handling products in accordance with the Ministry’s pollution prevention hierarchy. After the initial seven years of operation, based on a market-driven approach, the Program saw many accomplishments. However, on August 14, 2018, the Ministry rejected OPEIC’s program plan based on the market-driven approach and encouraged OPEIC to adopt a more traditional stewardship model with an independent collection system and assume responsibility for the cost of collecting the programs obligated products. To accomplish this transition in a timely manner and minimize redundancy of efforts, OPEIC contracted with service providers and other organizations, to handle the program’s operations.

In October of 2024, OPEIC’s contracted service provider-Canadian Electrical Stewardship Association (CESA) amalgamated with Electronics Recycling Association Canada (EPRA). EPRA the (“service provider”) is now contracted by OPEIC to utilize its network of collection sites including collection, transportation and processing of EOPE program products. Operational changes took effect on January 1, 2025.

OPEIC operates an “evergreen” stewardship model which is designed for continuous plan improvements and allows the program to adapt and innovate within the evolving recycling marketplace.

Since implementation of the OPEIC approved plan, the program has:

- Implemented a service provider partnership fulfilling collection, transportation, and processing services across the province,
- Shifted from a free-market collection system to a model with now over 230 permanent collection sites at an increasing 98% accessibility rate,
- Achieved remarkable reach with 158% increase in consumer awareness.
- Participated in community collection events including ongoing efforts with the [First Nations Recycling Initiative \(FNRI\)](#).

Addressing plan requirements, targets, and goals remain a program core focus, with ongoing continuous improvements that are acknowledged and formally accepted within the program annual reports. OPEIC is achieving its planned goals and has made significant improvements in various areas since being recently approved.

This Program Plan addresses the following:

- The regulatory responsibilities of producers of EOPE;
- The appointment of OPEIC as agent for EOPE producers;
- Products managed under the Program;
- The consultation process followed in developing the Program Plan;
- The Program's collection system;
- Public awareness of the Program, collection system and proper handling of Program Products;
- Management of program costs and dispute resolution;
- Product management in relation to the pollution prevention hierarchy; and

OPEIC remains committed to exploring innovative ways to fulfill the overall program performance and accessibility. The renewal plan expands on its approved commitments and will continue enhancing the programs stated objectives. In April 2024, OPEIC opened consultation to the ongoing implementation of the OPEIC plan without any subjective amendments to its "evergreen" format. This consultation period was set based on ministry approval of a program submission extension to resubmit the OPEIC plan by August 7, 2024.

Following the submission of the Plan on August 7, 2024, the British Columbia Ministry of Environment and Parks (BCMEP) has provided feedback, which has been carefully considered and integrated into this the Program Plan. In accordance with regulatory requirements, the next scheduled renewal of the Program Plan is due by April 20, 2027.

A summary of the key program performance metrics, including products collected, waste composition audits, accessibility and consumer awareness, is provided in [Section 11](#) of this Program Plan. A summary of the 2024 public consultation period is included [Appendix B](#).

Glossary of Terms and Abbreviations

Abbreviation	Full Term
BCMEP	British Columbia Ministry of Environment and Parks
CESA	Canadian Electrical Stewardship Association
EPRA	Electronic Products Recycling Association
CWMA	Coast Waste Management Association
EHF	Environmental Handling Fee
EOPE	Electrical Outdoor Power Equipment
EPR	Extended Producer Responsibility
EPSC	Electronics Product Stewardship Canada
ERS	Environmental Recycling Standard
ICI	Industrial, Commercial & Institutional
OPEIC	Outdoor Power Equipment Institute of Canada
PPH	Pollution Prevention Hierarchy
RCBC	Recycling Council of British Columbia
RCC	Retail Council of Canada
SABC	Stewardship Agencies of B.C.

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1 Introduction

The Outdoor Power Equipment Institute of Canada (OPEIC) Extended Producer Responsibility Plan (“Program Plan”) addresses the end-of-life management of electrical outdoor power equipment (EOPE) products captured under Schedule 3, section 2(1)(d) (“Electronic and Electrical Product Category”) of the BC Recycling Regulation B.C. Reg. 449/2004 (O.C. 995/2004) (“Regulation”). EOPE is a broad category of products classified into four sub-categories: hand-held EOPE, walk-behind EOPE, free-standing EOPE and lawn tractors. This Program Plan is submitted by the Outdoor Power Equipment Institute of Canada (OPEIC) to the British Columbia Ministry of Environment and Parks, pursuant to the requirements of the BC Recycling Regulation (“Regulation”).¹ The Program Plan replaces the OPEIC Extended Producer Responsibility Plan approved on July 30, 2020.

OPEIC will administer the program and contract the collection, transport, and processing of EOPE to another stewardship agency (i.e. the service provider), which has achieved numerous accomplishments over the past years of operation. The Program recognizes the continued success of the stewardship agency and has contracted services with them to preclude redundancy of efforts, to capitalize on their efficiencies, improve awareness, and to provide enhanced access to consumers.

¹ British Columbia Ministry of Environment and Parks, *BC Recycling Regulation, B.C. Reg. 449/2004 (O.C. 995/2004)*.

2 Duty of Producer

Part 1, Section 2(1) of the Regulation provides:

Except as otherwise specifically provided in this regulation, a producer must

- (a) have an approved plan under Part 2 [Extended Producer Responsibility Plans] and comply with the approved plan, or*
- (b) comply with Part 3 [Extended Producer Responsibility Program Requirements if No Extended Producer Responsibility Plan]*

with respect to a product in order to sell, offer for sale, distribute or use in a commercial enterprise the product in British Columbia.

The Regulation defines "Producer" as:

(b) in respect of the producer of a product within a product category other than the beverage container product category or the tire product category,

- (i) a person who manufactures the product and sells, offers for sale, distributes or uses in a commercial enterprise the product in British Columbia under the manufacturer's own brand,*
- (ii) if subparagraph (i) does not apply, a person who is not the manufacturer of the product but is the owner or licensee of a trademark under which a product is sold, distributed or used in a commercial enterprise in British Columbia, whether or not the trademark is registered, or*
- (iii) if subparagraphs (i) and (ii) do not apply, a person who imports the product into British Columbia for sale, distribution or use in a commercial enterprise;*

The BC Recycling Regulation Guide further details the definition of a producer as an "importer, broker or retailer who sells the product directly to a consumer or imports and uses the product in a commercial enterprise and includes catalogue or Internet transactions."²

² British Columbia Ministry of Environment and Parks, *Recycling Regulation Guide* (April 2012).

3 Appointment of Stewardship Agency

The Outdoor Power Equipment Institute of Canada (“OPEIC”) is a not-for-profit organization of manufacturers, brand owners and retailers of electrical outdoor power equipment (EOPE) products (“Program Products”) created to provide its participants with EOPE end-of-life product management by handling Program Products in accordance with the pollution prevention hierarchy.

OPEIC is incorporated under the Canada Not-for-Profit Corporations Act, and its participants consist of members of the Outdoor Power Equipment Institute (OPEI), the industry association for the outdoor power equipment industry in North America. OPEIC’s incorporation documents are available for review upon request.

OPEIC’s Board of Directors is comprised of the same EOPE manufacturer representatives on OPEI’s board. A current list of OPEIC’s Board of Directors responsible for the oversight of the Program is available on [OPEI’s website \(https://www.opei.org/about/leadership/\)](https://www.opei.org/about/leadership/). OPEIC’s bylaws and financial statements (contained in the Program’s annual report) are available on the OPEIC website (www.opeic.ca). Any changes to OPEIC’s governance structure will be reflected in the annual report. Additionally, OPEIC consults with other manufacturer and retailer associations, including the Retail Council of Canada (RCC).

The Program works and consults with an advisory group called the Outdoor Power Equipment Institute - Canadian Task Force (“OPEI-CTF”), comprised of representatives from the industry sector. Product Care Association (“PCA”) continues to provide management services to OPEIC.

OPEIC participants represent the vast majority of the electrical outdoor power equipment market in British Columbia for regulated products. Program membership is open to all, including the manufacturers, brand owners, distributors, first importers and retailers of designated products that are directly sold within or into BC.

Each of the Program’s participants appoint OPEIC as their stewardship agency as described in section 2(2) of the Regulation. OPEIC participants confirm the appointment by accepting the terms of OPEIC’s participant agreement during the registration process. A record of this acceptance is available upon request by the Director. A current list of OPEIC participants is available on [OPEIC’s website](#).

4 Products Covered Under the Stewardship Plan

EOPE products are captured under Schedule 3, section 2(1)(d) (“Electronic and Electrical Product Category”) of the Regulation:

“(d) electronic or electrical tools, other than large-scale stationary industrial tools, including, without limitation,

...

(v) snow blowers and mowers and other gardening tools”

The Regulation and this Program Plan address electric outdoor power equipment (EOPE). EOPE is a broad category of products classified into four categories: hand-held EOPE, walk-behind EOPE, free-standing EOPE and electric lawn tractors. These categories include battery powered (primarily lithium ion and perhaps some lead-acid) and electric powered (primarily 110V plugged in) products as summarized in Table 1 below. Examples include electric lawn mowers, electric snow blowers and electric-powered gardening equipment. OPEIC reserves the right to amend this list of products in the future, as appropriate. Section 4.2.3 below details the scope of batteries managed through the program.

4.1 Inclusion/Exclusion of Products

The decision to include or exclude a product in the Program involves the consideration of a variety of product attributes, including but not limited to the features listed below. An internal decision tree is used to guide product decisions in addition to input received from the OPEI-CTF comprised of manufacturers and retailers.

4.2 Product Categories

Program Products are organized into four categories of EOPE. Table 1 lists examples of accepted products under each product category.

Table 1: OPEIC Electric Outdoor Power Equipment Product Categories

Hand-Held EOPE	Walk-Behind EOPE	Free-Standing EOPE	Electric Lawn Tractor
Brush cutter/lopper	Lawn mower (including robotic lawn mower)	Mulcher	Lawn tractor
Chain saw	Snow thrower/snow blower	Pressure washer	
Garden shear	Tiller/cultivator	Woodchipper/shredder	
Garden sprayer/insect fogger/weed steamer	Dethatcher	Wood splitter	
Ice drill	Walk-behind sprayer		
Lawn blower/vacuum	Edger/trimmer		
Pole saw/pole pruning saw	Lawn aerator		
Post hole digger	Walk-behind blower/vacuum		
Stick edger			
Tiller			
Trimmers (grass, hedge, split boom, etc.)			

OPEIC’s product categories and products included under each category are subject to change at OPEIC’s discretion. Future products that fit within the above categories will be considered for inclusion in the Program. Participants are made aware of any product decisions and/or changes to product categories through notices and updates to product lists on the website.

OPEIC maintains a current list of product inclusions and exclusions online (<https://www.opec.ca/recycle-outdoor-power-equipment>).

4.2.1 Product Design

Determining whether a product is included or excluded from the Program is based on the product’s intended use, not who used the product (i.e., the “generator”). Electrical outdoor powered products designed for household outdoor use are included in the Program. The

Program excludes electrically powered products designed for large-scale industrial or commercial purposes, such as construction and large-scale farming equipment.

4.2.2 Orphaned Products

Accepted products include orphaned products. This includes items that are no longer in production or which the manufacturer is no longer producing. As long as the product fits under one of OPEIC's existing product categories and is electric-powered, the Program will accept it.

4.2.3 Batteries

The Program accepts all batteries sold with (i.e. embedded in or packaged with) Program Products. While the Program collects embedded batteries associated with its Program Products, no separate environmental handling fee is applied in relation to the battery.

EOPE does not use primary (single-use) batteries. They are powered using rechargeable batteries exclusively. Batteries must be returned together with the EOPE; standalone battery returns are not accepted.

4.2.4 Accessories

The program accepts accessories returned together with the EOPE such as trimmer shields, mechanical EOPE protective covers, chargers, and embedded batteries. However, accessories sold separately and returned without the EOPE cannot be identified as EOPE and are not accepted by the program.

5 Stakeholder Consultations

Notice of the consultations was issued on March 14, 2024, via direct notification to all impacted interested parties, including, but not limited to, industry members, industry associations, service providers, non-profit organizations, First Nations, and regional and local governments. Notice was also available for distribution through the Recycling Council of BC and Coast Waste Management Association’s e-newsletters and posted on OPEIC’s website along with a copy of the proposed program plan. OPEIC initiated consultation on the continuous implementation of the OPEIC plan, maintaining its "evergreen" format without introducing subjective amendments.

5.1 OPEIC Program Plan Consultation

Webinar consultations were conducted on April 4 and April 11, 2024, respectively. Program participants were also informed of the consultation process and provided an opportunity to provide feedback during the OPEIC annual meeting held on February 14, 2024. OPEIC offered the British Columbia Product Stewardship Council (BCPSC) a dedicated webinar to which they declined the invitation and could participate in the public consultations. In total, 43 individuals registered for one of the two open consultations with 25 participating. Table 2 below shows the breakdown of registrants and participants by sector.

Table 2: Consultation Registrants and Participants by Sector for the Open Webinars

Sector	Registered	Participated
Regional District	12	9
First Nation	0	0
Municipality	1	1
Service Provider	7	1
Industry Association	3	2
Provincial Gov	2	2
Stewardship Agency	2	2
Participant	10	4
Other/Unknown	6	4
Total	43	25

Comments regarding the program plan renewal were accepted up until the close of the consultation period on April 29, 2024. OPEIC received a total of 53 comments during the webinars and subsequently in writing. A list of the organizations that participated in the 2024 consultation is provided in [Appendix A](#). The questions and responses are summarized in the Consultation Summary as [Appendix B](#) to this program plan. The Summary documents the

comments/questions posed, OPEIC's response, the commenter's industry sector and the number of commenters posing the question (multiple individuals posed the same question in some instances).

5.2 Consultations on Producer Paying the Cost of Managing Obligated Products & Dispute Resolution

Pursuant to the *Guidelines on Producer Paying the Cost of Managing Obligated Materials and Dispute Resolution* issued by the MoEP on April 24, 2018, the MoEP directed OPEIC to:

- a) Complete satisfactory consultation with stakeholders to meet the requirements set out in sections 5(1)(c)(i) and (vi), taking into consideration guidance provided in the Recycling Regulation Guide 2012 and Producers Paying the Cost of Managing Obligated Materials and Dispute Resolution 2018.
- b) Submit to the director a stakeholder consultation summary document; and
- c) Propose amendments to the plan that address regulatory requirements and outcomes of the consultations.

The following pertains to OPEIC's previous contracted service provider. Future updates with OPEIC's active service provider will be provided in future program plans.

Following release of the Ministry's Guidance document, and to ensure compliance with section 5(1)(c)(i) and (vi) of the Regulation, OPEIC engaged with a group of stewardship agencies to retain a consultant, develop a methodology to study the costs associated with managing stewardship product, and host joint consultations. A Request for Proposal was issued in 2019 to major consulting and accounting firms to manage the depot costing data collection and modelling. From three responses received, OPEIC retained Meyers Norris Penny LLP (MNP LLP) in conjunction with other stewardship programs to conduct a study on the costs associated with managing EOPE for the OPEIC program to assess compliance with section 5(1)(c) and (vi) of the Regulation. As the seventh largest accounting firm in Canada, MNP LLC is trusted to use industry accepted standards, adhere to professional requirements, and had previous experience in cost modelling within the stewardship world. Details regarding the study's methodology and findings are detailed below under "Producers Paying the Cost".

In cooperation with our previous contracted service provider, who was a stewardship agency, OPEIC conducted two webinar consultations with interested stakeholders on the study's findings on October 7 and 8, 2019. Notice of the webinar consultations was sent to all contracted collection sites, as well as other interested stakeholders. In total, 21 individuals registered for one of the two open consultations with 16 participating. Table 2 shows the breakdown of registrants and participants by sector.

Table 2: Consultation Registrants and Participants by Sector

Sector	Registered	Participated
Regional District	2	2
First Nation	0	0
Municipality	0	0
Service Provider	13	8
Industry Association	1	1
Stewardship Agency	5	5
Total	21	16

The comment period was open for five weeks. OPEIC received no substantive comments regarding the study methodology or the OPEIC program during the webinars, or subsequently in writing.

Dispute Resolution

Section 10 of the Program Plan sets out OPEIC's dispute resolution process as presented during the consultations. OPEIC received no questions regarding the dispute resolution process.

Producers Paying the Costs

Through its contracted service provider, OPEIC uses a market-based approach for its compensatory scheme for collection sites, and market-pricing through a competitive bidding process for other elements of its contracted services.

To inform the consultations, MNP developed a robust methodology to assess the costs associated with collecting Program Product. MNP initiated the process in May 2019, designing a survey to obtain relevant financial data from collection sites. A handful of collection sites were selected to test the survey, which allowed for refinements, if required, before it was issued to the larger group of collection sites. All collection sites were invited and encouraged to respond to the survey and have input into the overall assessment. MNP's outreach efforts included:

- Contacting 221 collection sites
- Sending 245 receipt confirmation emails
- Sending 466 emails to participating and non-participating collection sites
- Conducting 187 phone calls to participating and non-participating collection sites

Completed responses were received from five depots, partially (but sufficiently) completed surveys were received from 27 depots, and nine depots started, but did not sufficiently complete the survey.

In addition to the online survey and data collection, time and motion studies were completed at two collection sites. This information helped support the data provided by the collection sites and added a quality assurance component to the overall dataset.

Data from our previous contracted service provider helped to inform the model by providing the volume and number of mega bags and pallets, frequency of pickup, compensation paid, breakdown by product category, and collection site contact list. The data submitted from participating collection sites included labor costs, equipment needed and costs, space requirements, operations and storage needs, average costs per ft², handling time, and administration allocation.

Based on the limited responses received, MNP developed an analysis and cost compensation model, including a breakdown of cost categories, allocations of cost to activities and allocation of activities to products as detailed in [Appendix C](#).

While OPEIC had hoped for greater participation, collection site associations encouraged their members not to participate. Despite this, there was sufficient participation to determine that the current compensation levels provided by the contracted service provider and the costs to manage EOPE appear to be relatively close, with a contribution margin of approximately 11%.

No questions were posed directly to OPEIC during the consultations. It was confirmed that any outstanding issues related to compensation would be addressed before the end of the year. However, it was emphasized that the contracted service provider operates as a non-profit, so expenses cannot exceed revenues. Requests for operational improvements will need to be assessed at the same time as any requests for increased compensation. The input of collection sites in this prioritization exercise will be critical to ensure general acceptance of the next steps forward.

As a result of the collection site compensation study, OPEIC, through its previous contracted service provider, has engaged in a much broader discussion with collection sites. Issues to consider include how to incentivize good performance, adjusting for regional differences, addressing cross-program contamination and non-program products, and addressing possible delays or cancellation of other program elements to accommodate any rate adjustments. We will continue to work with the contracted service provider to consider ideas put forward based on these discussions.

It is in OPEIC's best interest to have its contracted service provider maintain a strong collection network. Similarly, it is in the interest of collection site operators to engage with stewardship programs that service their customers. By working together to resolve any outstanding issues over the coming months and years, OPEIC is confident that the long-term health of the

collection network will be maintained. Going forward, OPEIC will plan to take part in the program's contracted service providers cost studies.

6 Collection System and Consumer Accessibility

OPEIC has contracted with a service provider for the collection of EOPE. In accordance with Part 2, Section 5(1)(c)(iii) of the Regulation, OPEIC through the active service provider will employ a system of permanent year-round collection facilities located across British Columbia to provide access to recycle Program Products at no cost to consumers. OPEIC's collection network will, at a minimum, maintain the same network of collection sites as the active service provider. This collection system has been developed in collaboration with other stewardship programs to enhance program performance through increased operational efficiencies. This also assists in reducing consumer confusion by providing consumers with a one-stop-shop for designated products where they can recycle multiple products at one location. Where feasible, OPEIC, through the active service provider, will continue to manage the collection network with a focus on stewardship collaboration in the future.

Neither the contracted service provider nor OPEIC directly own or manage any collection facilities but rather contract with organizations that can provide a collection location. Collection facilities include any location that accepts Program Products, including but not limited to private drop-off centres, local government sites, service organizations and return-to-retail. Regardless of the type of collection facility, there is no charge to the consumer to drop-off Program Products.

6.1 Collection Site Types

Program Products have historically been categorized into two major groups for the purposes of collections: "Regular" and "Bulky." "Regular" products include products such as chain saws, bush cutters, garden shears, tillers, ice drills and are designed to be carried by the equipment operator either on their back or in their hands and might have accessory wheels. "Bulky" products included larger EOPE like ride-on electric lawn tractors. In 2024, our contracted service provider combined the regular and bulky collection streams, with all contracted sites accepting both types of products. For the purposes of this plan and reporting, Regular and Bulky Products will be collectively referred to as Program Products, unless otherwise specified.

Advertised collection facilities accept public drop-off of Program Products. The active service provider's collection network includes some unadvertised collection sites that do not allow public drop-off, including some thrift store locations and municipal facilities and landfills, these are not listed as a facility on OPEIC's website or through RCBC's consumer hotline.

The collection network is augmented by participating in one-day collection events. The success of these collection events is increased through collaboration with a variety of community partners, including retailers, regional districts, municipalities and indigenous communities, as well as other stewardship agencies. The scope of products accepted at collection events depends on the type and location of each collection event; some of which have the ability to collect regular/light products only, while some organized by local or regional governments may have the capacity to accept bulky products (ride-on lawn tractors). OPEIC will endeavour to provide collections wherever it is practical and logistically feasible. The Program will continue to evaluate the success of the active service provider's outreach program and will consider alternative collection possibilities as they develop.

In addition, the Program has partnered with other stewardship agencies to create a First Nations Field Specialist who liaises directly with indigenous communities throughout BC:

- To partner with more Indigenous communities
- To organize joint collection events in Indigenous communities
- To collect greater tonnages of Program Products from Indigenous communities

6.2 Accessibility

The Program measures consumer access to collection facilities in accordance with the Accessibility Standard established by the Stewardship Agencies of BC (SABC). SABC is an informal organization through which provincial stewardship programs work together on common issues of interest. The Accessibility Standard was put forward to assist in defining the "Reasonable Access" requirements under the Recycling Regulation for communities of varying sizes. SABC's Standard defines reasonable access as a 30-minute drive to a collection site in urban areas with a population of more than 4,000, and a 45-minute drive to a collection site in rural areas with a population more than 4,000.

For the purposes of this Standard, rural communities are defined as cities, towns, resort municipalities and district municipalities with a population of between 4,000 and 29,999 outside the Metro Vancouver and Capital Regional Districts. Urban communities are defined as cities, district municipalities and towns within the Metro Vancouver and Capital Regional Districts with a population of 4,000 or more, and cities and district municipalities with a population of 30,000 or more in the remainder of the province.

The Statistics Canada definition of urban and rural population size has changed since SABC originally developed this Standard, however SABC maintains that the Standard is still applicable. OPEIC services communities that are defined by the Standard as rural with a population of more than 4,000. Residents of communities where the population is less than the minimum requirement for the Standard to apply must also visit larger commercial centres

for other basic needs such as food, fuel, and clothing. Therefore, it is reasonable to expect that the recycling of designated products can be done in the centre where the residents undertake other commercial activities.

The SABC Accessibility Standard was established as a minimum threshold to ensure reasonable access to collection facilities for a high percentage of the province's population. A population centre that meets the SABC Accessibility Standard and does not have a permanent collection site for Program Products is considered a "gap area".

Effective January 1, 2025, operational changes were implemented due to the amalgamation of our service provider. OPEIC will commit to the accessibility target of the active Service Provider (98%) and will provide updates on accessibility in a successive plan renewal. Updates on accessibility can also be found in OPEIC annual reports.

Both the Regular and Bulky streams are now combined, and all contracted collection sites accept both product types, therefore, accessibility for bulky products has significantly improved. This represents a notable shift from earlier phases of the program, when the collection system was divided, and a greater number of sites accepted only Regular products. While population size and product consumption still vary across regions, the current collection network is designed to meet the SABC Accessibility Standard and provide equitable access for the recycling of EOPE, including bulky items (ride-on electric tractors). OPEIC continues to explore and support alternate service models where needed—such as collaborating with community partners or stewardship agencies to host collection events, providing direct pickup, with coordinated and targeted collection opportunities where feasible, and partnering with First Nations initiatives such as the FNRI (First Nations Recycling Initiative) who also works with IZWTAG (Indigenous Zero Waste Technical Advisory Group). OPEIC also remains committed to the SABC-led initiative addressing accessibility with the support of regional districts and will continue to participate in these efforts moving forward.

OPEIC commits to maintaining the accessibility rate of 98% for all Program Products. OPEIC will ensure that gap areas that do not have a permanent collection site for Program Products are serviced in a timely manner and a manner appropriate to the context as determined by OPEIC while also continuing to endeavor to improve accessibility to permanent collection sites for Program Products in gap areas.

OPEIC no longer needs to report on government requests for access to bulky product collections in the annual report, due to the combination of both collection streams. However, OPEIC remains committed to transparency and collaboration and can provide this information upon request.

See section 6.1 for additional information on collection events.

6.3 Collections

Since the start of the Program in 2012, OPEIC has reported on collections using sampling studies in lieu of reporting on actual collection volumes. OPEIC visited select scrap metal recycling facilities where Program Products were collected under a market-driven system and sampled metal piles to confirm that the private scrap metal recycling system was managing EOPE. With the transition to a more traditional collection site system and the combination of the Regular and Bulky streams, sampling is no longer required at scrap metal sites. Due to the amalgamation of our previous contracted service provider, a revised sampling methodology will be implemented and reviewed. Under the current collection system, the active service provider will collect all EOPE Program Products.

The total weight of EOPE collected will be estimated by sampling a portion of the bags collected each month and applying this weight to the total collection tonnage reported monthly by the active service provider. OPEIC will use the total weight of Program Products collected in 2020 as a baseline and commit to maintaining or increasing the total annual weight of Program Product collected year-over-year. OPEIC will continue evaluating these metrics based on the accumulated data from the service provider.

OPEIC began reporting on total estimated units collected starting with the second full reporting year following plan approval (2022) and will continue to do so annually.

OPEIC has developed a methodology for estimating units of EOPE collected. However, due to the amalgamation of a prior contracted service provider, a revised unit estimation approach will be implemented and reviewed. Units will be estimated using the same monthly sampling process used for weight calculations, with selected bags analyzed to determine a representative number of EOPE units per bag. OPEIC will report out on this methodology and the units collected in the annual report.

With the active contracted service provider, OPEIC will periodically review the methodologies over the coming years and determine the most suitable approach for calculating estimated units collected. Revisions can be made to the methodology throughout the term of the plan.

OPEIC will work with local governments individually upon request to address their unique reporting requirements.

Due to the historic market-driven collection model, OPEIC did not have historical annual collection tonnage data to forecast future targets. However, with several full years of data now available, OPEIC will continue to assess trends to support the development of

appropriate collection targets. Seasonality continues to be a factor, and multi-year data remains essential for setting meaningful targets.

Based on the progress to date, OPEIC commits to:

- Report annually on the total estimated weight of Program Products collected.
- Maintain or increase total estimated weight collected year-over-year from the 2020 baseline.
- Report annually on the total estimated weight of Program Products collected by regional district.
- Report annually on the total estimated weight of Program Products collected per capita by regional district.
- Continue applying and reviewing the proposed methodology for estimating units collected and report annually on total estimated units collected.

6.4 Capture Rate and Recovery Rate

A “capture rate” compares the quantity of products collected in a year to the quantity of products estimated to be “available to collect” in the same year. In contrast, a “recovery rate” compares the quantity of products collected in a year to the quantity of Products actually sold into the market in that year. Recovery rates are not an appropriate metric for products with long lifespans because the amount sold into the market in a year is not directly related to the amount collected in the same year, as it is with consumables like beverage containers. A capture rate is generally applied in the context of long-life products, however neither capture rate nor recovery rate can be used as a performance metric for EOPE products for the following reasons:

- The quantity of product sold is determined from sales reports submitted by participants in units, whereas product collected is reported by weight (kg). As noted in section 6.3 above, there is no standard conversion factor for weight to units or units to weight for individual products or product categories given the variety of each type of product in the market within the OPEIC’s product categories. It is problematic to report total units or total weight as there are four categories that contain both regular and bulky products.
- Collecting unit data on Program Products collected is cost prohibitive. The required effort to track unit counts of each category of product collected is not feasible due to the number and variance of product categories and Program Products. OPEIC accepts a wide range of products, which are commingled with hundreds of products collected by the contracted service provider, ranging in size from an electric toothbrush to a microwave.

In calculating a capture rate for products, the amount “available to collect” is an inexact exercise that takes into consideration the number of units of a product sold into the market

historically over successive years and the product's lifespan. The life expectancy of products is based on hours of use that is often determined by the motors within the equipment. As a result, the number of years that a product lasts may vary greatly based on its level of use.

The Program will not provide a recovery rate for batteries for various reasons:

1. Batteries are commingled at point of collection. The contracted service provider's collection bags capture products from three different programs. Products from all three programs may contain batteries.
2. Some battery types can be the same for products from different programs. Some OPEIC products and products accepted through the contracted service provider's program use the same batteries. Once commingled at point of collection it is not possible to discern which program such batteries belong to.
3. Some products are recycled without a battery, while others are recycled with more than one battery. Accordingly, calculating a recovery rate based on the number of batteries recycled does not provide a reliable indicator of the true recovery rate of batteries.
4. There are EOPE products that are sold without batteries. Not all battery powered EOPE are sold with a battery, and not all products are returned with a battery.
5. There is the potential of batteries from non-program products recycled by consumers in the service provider's collection bags being associated with EOPE products. Consumers will often dispose of additional batteries in the contracted service provider's collection bags when recycling their products potentially resulting in an inflated number of batteries collected in relation to the amount of batteries sold with EOPE products.

6.5 Waste Composition Audits

Waste composition audits are conducted in partnership with local governments and other stewardship programs, subject to mutually agreed upon terms, to determine if the Program Product is being successfully diverted from landfill. Local governments utilize waste composition audits as the means of determining the breakdown of materials in their landfills at a frequency they have determined satisfactory to evaluate their waste composition. Each year, the Program consults with local governments to identify waste composition studies scheduled for that year. OPEIC collaborates with local governments and other stewardship programs to make the studies as economical and efficient as possible. The Program will participate in all waste composition studies committed to by SABC.

The waste composition study methodology and sample sizes are determined by the local government responsible for the audit. The product categories included in the studies are determined in cooperation with the various stewardship agencies, including EOPE as a product category.

The report provided by the consultant conducting the study includes the date and location of the audits, as well as the number of units of Program Products identified. The audit results are considered to be informative for the region in which the study was conducted, but due to variations in collection patterns and waste management practices, are not considered applicable to other regional districts.

OPEIC commits to:

- Participate in all waste composition studies committed by SABC
- Report the number and location of waste audits conducted annually
- Report out on the Kilograms per capita of Program Product identified per waste audit conducted
- Report batteries in kilograms per year for each audit conducted.

As part of the commitment to report program batteries in kilograms per year for each audit conducted, it is important to note that it is not possible to differentiate between batteries from other EPR programs within the waste audit. Therefore, the reported figures reflect the total quantity of all batteries under 5 kg identified per audit.

Table 4: Collections Performance Metrics

Performance Metric	Reporting Commitment/Target
Collection Sites	
Number and location of contracted collection sites identifying changes from previous year	Report annually
Number of collection sites by regional district	Report annually
Number of collection events by regional district	Report annually
Collections	
Estimated weight of Program Product collected	Report annually
Estimated weight of Program Product collected by regional district	Report annually
Estimated weight of Program Product collected per capita by regional district	Report annually

Performance Metric	Reporting Commitment/Target
Estimated units of Program Products collected	Report annually
Accessibility	
Accessibility rate for Program Products	Maintain 98% based on SABC's Accessibility Standard (<i>i.e., Reasonable access of a 45-minute drive to a collection site in rural areas with a population of more than 4,000</i>).
Reevaluate collection network to ensure that accessibility rates have not materially changed over the duration of this Program	In accordance with the contracted service provider's re-evaluation schedule (<i>i.e., every other year</i>), OPEIC will participate in accessibility studies conducted by the program's active service provider.
Survey techniques and results	Report each year in which a survey is conducted
OPEIC will commit to holding a minimum of one (1) advertised collection event annually for communities where permanent collection facilities or direct pick-up services are not yet established, in accordance with the SABC standard	
Waste Composition Audits	
Participate in all waste composition studies committed by SABC	Report annually
Number and location of waste audits conducted	Report annually
Kilograms per capita of Program Product identified	Report annually

Performance Metric	Reporting Commitment/Target
Batteries are reported in kilograms per capita for each audit conducted	Report annually

7 Consumer Awareness

Section 5(1)(iv) requires that a stewardship plan make adequate provision for informing consumers about the Program, including the location of facilities and proper management of Program Products. The Program will continue to work with other stewardship agencies to provide coordinated program information and access to consumers, where applicable. This includes collaboration with RCBC to provide a single point of consumer information through a hotline, website and Recyclepedia smartphone app, as well as a joint product guide with other stewardship programs through SABC.

7.1 Consumer Market in BC

Research indicates that there is a limited market for EOPE in the province. Unlike many other stewarded consumable products, EOPE dealers indicate that the vast majority of EOPE products are sold in urban/suburban areas of the province. Furthermore, sales of EOPE are seasonal. Based on this information, the program’s focus is to raise awareness about recycling opportunities for EOPE amongst the segments of the population that use EOPE.

7.2 Communication Objectives

The Program’s communications objectives are to:

- a) Sustain and build upon progress in consumer awareness, aiming to achieve and maintain at least 70% awareness of EOPE among consumers, surpassing the baseline of 26% established in 2017.
- b) Continue leveraging a diverse mix of general and targeted media platforms to effectively reach and engage the Program’s varied audiences.
- c) Strengthen stakeholder engagement by encouraging proactive collaboration and support through available resources such as collection events and point-of-sale/point-of-return materials.

7.3 Target Audiences

In addition to general population marketing, the program will use our current understanding of the market to target the following market segments:

- a) Suburban and urban consumers
- b) Indigenous communities

7.4 Communications Strategy, Tools and Methods

The Program will utilize a robust communications strategy for British Columbia that engages consumers at every stage in the lifecycle of the product in order to increase awareness levels and encourage consumer participation throughout the province

OPEIC will employ industry best practices in the promotion of the Program, adjusting its specific mix of media channels, partners and suppliers based on ongoing performance analysis. Specifically, the program will communicate the changes in its collection network through its collection site finder and RCBC's Recyclepedia and phone hotline. The following describes the tools/methods OPEIC may employ throughout the chain of custody of Program Products:

7.4.1 Start of Product Lifecycle (Time of Purchase)

(a) Participant Communications

OPEIC will deploy regular communications via email to its participants to advise of developments in the Program, which they in turn can pass on to their customers.

(b) Point of Sale (PoS) Materials

Newly branded and updated rack cards, semi-permanent signage, event posters etc. are offered free of charge to retail stores, collection depots, trade shows and community events.

7.4.2 During Product Lifecycle (Use of Product)

(a) Advertising

OPEIC will use a variety of media partners to promote the Program throughout the province. Advertising channels may include various combinations:

- Digital media (web, social media, search, streaming)
- Traditional media (TV, print, out-of-home, etc.)
- Community engagement (events, conferences, partnerships)

7.4.3 End of Product Lifecycle (Recycling)

(a) Website

OPEIC operates a dedicated program website (www.opec.ca) with relevant information for all audiences with whom it engages. Information includes, but is not limited to:

- Collection site locations (supplied via a location-based finder tool) with details on hours of operation and products accepted
- Details on upcoming collection events
- Proper handling and management of Program Products and accessories
- Detailed description of products accepted by the Program
- Details on environmental handling fees associated with the Program
- Contact information for those with questions
- Annual reports and other program information
- FAQs related to the Program
- Relevant news and updates

(b) Dedicated Phone and Email Contacts

The Program will continue to provide a dedicated phone and email address where the public can call to obtain information about the program (1-877-592-2972 ext.424 and info@opec.ca).

(c) Point of Return (PoR) Materials

Rack cards, semi-permanent signage, event posters, branded prize materials, etc. will continue to be offered and distributed free of charge at retail stores, collection depots, trade shows and through community events.

7.5 Stewardship Agency Collaboration

OPEIC will continue to maintain its participation in the Recycling Council of BC's hotline and RCBC's online information portal "Recyclepedia", where the public can find information about accepted Program Products and where to take them. OPEIC will work with other stewardship agencies and local governments to minimize consumer confusion and address common issues through collaboration with other stewardship programs. To that end, OPEIC appreciates being notified when a municipality introduces a locator app or other tool for information residents about recycling options so that OPEIC can provide the municipality with up-to-date information about EOPE collection sites in their area to include in their app.

7.6 Dealer Support

The Program offers EOPE dealers with program information and materials. In addition to the information provided on the program’s website and rack cards, the Program has created a free downloadable [FAQ document](#) available to all Program Product dealers.

7.7 Consumer Awareness Survey

The Program conducts consumer awareness surveys every two years (since 2020) to determine consumer habits and perceptions of EOPE recycling options in BC. Surveys are carried out by an independent third-party survey provider. OPEIC will be responsible for its own consumer awareness levels and supporting activities. However, as OPEIC’s collection network will be synonymous with the contracted service provider’s network, OPEIC will consider whether to undertake a survey independently or in conjunction with the contracted service provider to allow for greater comparability and to maximize cost efficiencies.

An awareness level of 67% and 65% were achieved in 2022 and 2024 respectively and the program will aim to achieve and maintain an awareness level of consumers of EOPE of 70%.

Table 5: Consumer Awareness Performance Metrics

Performance Metric	Reporting Commitment/Target
Percent of residential consumers of EOPE that are aware that EOPE can be recycled	Reach for 70%
Consumer awareness survey	Conduct every two (2) years
Description of the program’s educational materials and strategies	Report annually
Summary of survey methodology and survey question asked	Report annually, as applicable
Program website visits	Report annually
RCBC Recyclepedia website visits & hotline calls	Report annually, as applicable

8 Management of Program Costs

8.1 Product Sales

EOPE is typically sold by dealers, hardware stores, department stores and other retailers, many of which are national in scope.

EOPE includes seasonal products, with the majority of sales occurring in the spring and fall. The winter months (December through February) have the lowest sales presumably because this is a period of low utilization of EOPE by consumers. Year-to-year variations can also occur as a consequence of variances in weather conditions. However, historic annual sales have remained relatively stable overall since the start of the Program.

The majority of EOPE is purchased in urban areas. Sales data from select retailers in British Columbia indicates that only a small proportion of EOPE is sold in rural regions of the province. Members of the OPEIC-CTF confirm that rural consumers seldom use plug-in or battery operated EOPE because the larger average size of rural properties makes it impractical to do so. This has important implications when considering the management of EOPE at end-of-life (EoL) in rural areas, as well as the need to address consumer awareness in rural areas.

Program revenues are derived entirely from environmental handling fees charged on product retail sales (see section 8.2 below). The program receives no direct revenue from the sale of products; the program's processors retain revenues from the sale of processed commodities and offset any revenues from commodity sales against their processing charges. Consequently, the Program does not have direct control over its revenue stream as this is dependent entirely on product sales, which in turn is dependent on a number of factors, including weather conditions and the state of the economy. Sales of EOPE in British Columbia are seasonal reflecting the time of year they are used (e.g., weed trimmers, snow blowers) and the severity of weather conditions. The variability in these factors year-over-year makes forecasting future sales difficult.

OPEIC will report annually the total units of EOPE sold in BC by product category aggregated to maintain confidentiality of individual participant market share.

8.2 Program Membership and Fees

The Program is funded by Environmental Handling Fees (EHFs), remitted to OPEIC by its participants based on the quantity of sales of new Program Products sold in British Columbia. The EHF is not a tax or a refundable deposit and at the discretion of the Producer, the EHF may appear at the time of retail sale as a separate charge or integrated as part of the program cost, and is subject to provincial sales tax. As the majority of retailers choose to show the EHF at

point of sale, OPEIC continues to work towards educating consumers by ensuring information on EHF is accessible (e.g. information on the Program's website).

EHF are set by OPEIC based on budgeting of fee revenue and program expenses and are adjusted from time to time to maintain the program's financial sustainability. Program revenues generated by EHF are applied to the full operation of the Program, including:

- I. Administration;
- II. Communication and education; and
- III. Collection, transport and processing of collected products.

OPEIC is responsible for covering the costs of collecting and managing OPEIC obligated products and accessories. The collection, transport, and processing of these items are carried out on behalf of the Program by the active contracted service provider.

8.3 Service Provider Compensation

OPEIC does not contract directly with collection sites, transporters and processors, but relies on its active service provider's collection network. In 2019, OPEIC conducted consultations in association with its previous contracted service provider on the methodology for determining compensation for collection sites. The details of these consultations are summarized in [section 5.2](#) above and [Appendix C](#). Based on findings from a study undertaken as part of the consultation process, it was determined that compensation levels and depot costs appear to be relatively aligned. In coordination with the OPEIC contracted service provider, OPEIC will provide results of future compensation studies conducted in future program plan renewals, when applicable.

8.4 Risk Management and Reserve Fund

OPEIC actively reduces the risk arising from product management by using a number of methods including:

- Requiring service providers conduct third-party audits of their operations (including operating procedures and control systems) as part of responsible environmental management practices.
- Maintaining adequate insurance to cover liabilities, environmental or other, including directors' and officers' liability insurance.
- Providing collection site guidelines for all contracted collection facilities. The guidelines provide practical guidance and best management practices for collection site operators regarding staff handling and storage of Program Products collected.
- Maintaining a reserve fund. The reserve fund provides financial stability to the Program in the event of unexpected increases in collection volumes, fluctuations in operating costs or reduced revenue due to economics or other factors. It also provides funds to

facilitate the Program’s windup, if necessary. OPEIC monitors the Program’s financial performance on an ongoing basis to ensure it remains financially sustainable and that an adequate reserve fund is maintained.

8.5 Audited Financial Statements

The Program reports annually on total sales in its annual report in accordance with generally accepted accounting principles and industry practice to ensure transparency and accountability. The Program’s financial statements are audited annually by an independent third-party auditor and are published on the Program’s website.

Table 6: Management Cost Performance Metrics

Performance Metric	Reporting Commitment/Target
Annual aggregated unit sales by product category	Report annually
Audited financial statements	Report annually

9 Management of Environmental Impacts

In response to Part 2, Section 5(1)(c)(viii) and Section 5(3)(a)-(g) of the Regulation, OPEIC through the active service provider will work with its service providers to ensure Program Products are managed, where feasible, in accordance with the Pollution Prevention Hierarchy (PPH).

As per section 5(3) of the Regulation *“For the purposes of subsection (1) (c) (viii), the pollution prevention hierarchy is as follows in descending order of preference, such that pollution prevention is not undertaken at one level unless or until all feasible opportunities for pollution prevention at a higher level have been taken”*.

The following sections also detail the program’s current management options for Program Products at end-of-life (EoL) and relevant considerations.

9.1 Reduce and Redesign

The following pertains to section s5(3)(a-b) of the Regulation.

9.1.1 Product Design

Product design influences the durability and reliability of products, which has a direct impact on the life of a product and EoL management options. Producers optimize product design to reduce the materials used, which in turn reduces product weight, material content and product volume. Specifically, Producers conduct analyses on the use of plastics and other materials in the design and manufacture of EOPE, maximizing the use of materials that can be recycled and reused.

Product design eliminates, wherever possible, the use of hazardous substances, replacing them with non-hazardous materials that can be reprocessed and reused.

Producers actively work to reduce the environmental impact associated with product packaging waste. Trends include the reduction in packaging weight and volume, more efficient use of packaging materials, the use of recycled content and recyclable materials.

Producers actively encourage dealers to consolidate orders, rather than place multiple small orders to lower packaging and transportation requirements.

9.1.2 Manufacturing Processes

Producers have ongoing initiatives to reduce waste associated with the manufacturing of products. These include the collection, recycling and reuse of remnant ferrous and non-ferrous metals that result from the manufacture of components. Other waste materials that can be

recovered and recycled during the manufacturing process for productive uses, including plastic, corrugated and paper materials, are collected for processing and alternate uses. Supply chain initiatives include the use of returnable/reusable packaging for components from suppliers. Suppliers are encouraged to locate support operations in close proximity to manufacturing operations, thereby reducing transportation-related energy use in the delivery of components.

Producers seek to reduce water use in water-dependent manufacturing processes through improved process efficiencies. Initiatives include the treatment and reuse of process water to reduce total needs.

9.3 Reuse

The following pertains to sections 5(3)(d) of the Regulation.

9.3.1 Reuse and Repair

The reuse market for EOPE is very well developed. Valuable EOPE equipment that is not at the end of their functional life are not expected to be dropped off at collection sites or collection events because they have residual value. The market facilitates the repair and reuse of EOPE through a variety of channels, including re-selling websites (e.g., Craigslist), garage sales, charitable organizations (e.g., Salvation Army or local product dealerships) and trade-ins on new product purchases. The Program recognizes that there is a robust and effective reuse system already in place outside the parameters of the Program and hence will focus on the collection and recycling of end-of-life EOPE. Some Producers provide reconditioned EOPE for sale, as well as offering repair parts and services via a user-friendly website directly accessible to consumers.

However, it is important to note that there are several considerations that make it difficult to include reuse and repair as a viable management option for Program Products. In Canada, there are requirements for mandatory safety testing under programs such as the Canadian Standards Association (CSA) or Underwriters Laboratories of Canada (ULC). Manufacturers are responsible for the safety of all products with safety certification. Outside of licensed and authorized service facilities, manufacturers cannot guarantee the safety of the product after it has reached end of life. Additionally, manufacturers may have warranty restrictions on the sale of used products.

9.4 Recycle/Recover

The following pertains to sections 5(3)(e-f) of the Regulation:

9.4.1 Program Products

The Program strives to manage collection materials using the highest option on the PPH as set out under subsections 5(3)(d-g) of the Regulation, where economically feasible and viable. OPEIC utilizes the contracted service provider's product management system to meet these objectives.

OPEIC's contracted service provider contracts with all processors who handle Program Products. Its processors are required to conform to the Recycler Qualification Office (RQO)³ Electronic Recycling Standard (ERS), among other required tracking, inspection and reporting standards as set out of the Program. The contracted service provider retains the right to audit processors at any given time to ensure awareness of health, safety and environmental concerns are in place and adherence to responsible downstream recycling processes, as per the ERS.

The ERS defines the minimum requirements for handling end-of-life electronics and contains mandatory environmental, occupational health and safety, and material handling requirements. This Standard was originally developed by Electronics Product Stewardship Canada (EPSC) in 2004 and is employed by electronic recycling programs and processors across Canada. Although the contracted service provider's processors currently use ERS, it may choose to adhere to a different recycling standard, such standard to be recognized and accepted nationally or by other provinces. OPEIC will commit to reporting annually on any changes to the environmental standards to which the contracted service provider holds its processors accountable.

As OPEIC's Program Products are accepted along with the active service provider's products and commingled at point of collection, materials are reported out by commodity only, not by product type or component. The management of plastics will be enhanced significantly as a result of collecting OPEIC Program Products with the active service provider's products. Its processors utilize processing techniques and technologies that separate out plastics, allowing them to be recycled. The Program follows the chain of custody through to the end fate of the product; however, the Program's ability to do so is limited by the ability of processors to provide such information. OPEIC commits to reporting all end fate information provided by the active service provider's processors in accordance with ERS in the Program's annual report.

Table 7 details current recycling and recovery methods for common commodities found in OPEIC Products. Through the active service provider, OPEIC will continue to manage collected

³ This Standard defines the minimum requirements for handling end-of-life electronics and contains mandatory environmental, occupational health and safety, and material handling requirements.

products and accessories, including batteries, in accordance with the Pollution Prevention Hierarchy whenever feasible and economically viable recognizing that the management process of commodities is subject to change.

9.4.2 Battery Management

As noted earlier, EOPE are powered using rechargeable batteries exclusively and do not use primary (single-use) batteries. The processors of Program Products remove all batteries and send them to an approved downstream processor where base materials are extracted and recycled. It is important to recognize the inherent value of EOPE, as consumers have the choice to return EOPE to scrap metal sites. These sites are out of OPEICs control, and those sites manage materials or embedded batteries according to their own policies and procedures.

The Program accepts all batteries recycled with Program Products. In accordance with the requirements set out in the RQO ERS, the service provider’s primary processors remove batteries from Program Products and send them to an approved downstream processor where base materials are extracted and commodified. Table 7 below provides a description of the downstream processes for commodity types. Materials are reported by commodity type and downstream processing method in the annual reports. OPEIC will report annually on the management requirements for batteries to final disposition.

OPEIC will report on the management method and processes for batteries employed by its contracted processors as provided by the processor in accordance with the RQO ERS. Additional information about the Recycler Qualification Process can be obtained at www.rqp.ca.

Table 7: Examples of Commodity Management Derived from Program Products

Commodity	Downstream Process ⁴
Aluminum	Shred and Consolidate
Circuit Boards	Smelt
Copper	Shred and Consolidate Shred and Smelt
Ferrous Steel	Shred and Consolidate, Sorting and Processing
Glass	Crush, Smelt, Washing & Grinding
Plastics	Sorting, Separation, Grinding, Extrusion and Pelletizing, Shredding and Granulation
Rechargeable Batteries	Processed and Recycled
Wire and Cables	Smelt, Sorting and Processing

⁴ Downstream Processes are based on the descriptions provided by the Recycler Qualification Office (RQO) and EPSC Electronic Recycling Standard verified Processors detailing the end disposition of product managed.

9.5 Dispose

As per 5(3)(g) of the Regulation, this is the lowest level on the PPH and includes “*otherwise dispose of the waste from the product in compliance with the Act*”. This option may be used in situations where there is limited or no options for recycling.

OPEIC, through the active service provider will work with its service providers to ensure Program Products are managed, where feasible, in accordance with the PPH.

Table 8: Management of Environmental Impacts Performance Metrics

Performance Metric	Reporting Commitment/Target
For Program Products, report all end fate information provided by the contract service provider’s processors in accordance with EPSC Standards	Report annually

10 Dispute Resolution

As OPEIC's operations are managed by a contracted service provider, any disputes arising will be managed by the contracted service provider employing its dispute resolution process.

The service provider contracts with all suppliers and service providers to the Program through commercial agreements. It also contracts with reputable downstream processors and ensures compliance with vendor standards. A three-step process is employed for any unresolved disputes arising from collection or processing contracts to ensure a timely and coordinated resolution.

- Step one: The contracted service provider will address any disputes with services providers directly through discussions;
- Step two: Any unresolved disputes will be addressed using negotiation and mediation between parties;
- Step three: If no resolution has been reached at this point, standard commercial legal procedures including arbitration and civil proceedings will be implemented if required.

11 Performance Monitoring and Reporting Commitments

The Program’s performance is measured using a number of indicators, including collection volumes, accessibility, consumer awareness and results from regional waste composition audits. Considered together, these metrics demonstrate the success of the Program. A summary of OPEIC’s performance metrics are listed below in Table 9. The reporting metrics set out below align with the Ministry’s third-party assurance requirements for financial and non-financial information.

All performance measures, reporting commitments and targets will be maintained moving forward until such a time that new performance measures, reporting commitments and targets are approved.

Table 9: Summary of OPEIC Program Performance Metrics

Performance Metric	Reporting Commitment/Target	Subject to Audit
Collection Sites		
Number and location of contracted collection sites, identifying changes from the previous year	Report annually and provide a list of sites with locations and identify changes from previous year	Yes
Number of contracted collection sites by regional district	Report annually	No
Number of collection events by regional district	Report annually	No
Collections		
Estimated weight of Program Products collected	Report annually	Yes
Estimated weight of Program Products collected by regional district	Report annually	Yes
Estimated weight of Program Products collected per capita by regional district	Report annually	No
Estimated units of Program Products collected	Report annually	Yes
Management requirements for batteries to final disposition	Report annually	No
Waste Composition Audits		
Participation in all waste composition studies committed to by SABC	Report annually	No

Performance Metric	Reporting Commitment/Target	Subject to Audit
Number and location of waste audits conducted	Report annually	No
Kilograms per capita of Program Product identified during waste audits	Report annually	No
Batteries are reported in kilograms per capita per year for each audit conducted.	Report annually	No
Accessibility		
Accessibility rate for Program Products	Maintain accessibility rate of 98% based on SABC's Accessibility Standard (i.e., Reasonable access of a 45-minute drive to a collection site in rural areas with a population of more than 4,000).	No
OPEIC will commit to holding a minimum of one (1) advertised collection event annually for communities where permanent collection facilities are not yet established, in accordance with the SABC accessibility standard		No
Reevaluate collection network to ensure that accessibility rates have not materially changed over the duration of this Program Plan	In accordance with the contracted service provider's re-evaluation schedule (i.e., every other year), OPEIC will participate in accessibility studies conducted by the program's active service provider.	No
Survey techniques and results	Report each year in which a survey is conducted.	No
Consumer Awareness		
Percent of residential consumers of EOPE that are aware that EOPE can be recycled	70%	No
Residential consumer awareness survey	Conduct every two (2) years	No
Description of the program's educational materials and strategies	Report annually	No

Performance Metric	Reporting Commitment/Target	Subject to Audit
Summary of survey methodology and survey question asked	Report annually, as applicable	No
Program website visits	Report annually	No
RCBC Recyclepedia website visits and hotline calls	Report annually, as applicable	No
Management of Environmental Impacts		
End fate management of materials	Report annually	Yes
End fate management of batteries	Report annually	Yes
Changes to Environmental Standards for processors of Program Products.	Report annually	No
Management Costs		
Annual aggregated unit sales by product category	Report annually	No
Audited financial statements	Report annually	Yes

Appendix A: Participating Entities in the Plan Consultation

#	Participating Entity
1	Alberni-Clayoquot Regional District
2	Best Buy
3	Call2Recycle
4	Canadian Electrical Stewardship Association
5	Canadian Tire
6	Cariboo Regional District
7	Central Kootenay Regional District
8	City of Delta
9	Columbia Bottle Depot
10	Columbia Shuswap Regional District
11	Comox Valley Regional District
12	District of Squamish
13	Electronics Products Recycling Association
14	Fastenal
15	Home Hardware
16	Metro Vancouver Regional District
17	Peace River Regional District
18	Recycling Council of BC
19	Return-It
20	Sunshine Coast Regional District
21	Squamish-Lillooet Regional District
22	Ucluelet Bottle Depot

Appendix B: Consultation Summary (2024)

In accordance with Part 2, Section 5(1)(c)(iv) of the BC Recycling Regulation and supporting guidance provided by the Ministry of Environment and Parks, the following summarizes all comments received by OPEIC from program stakeholders during public consultations held by OPEIC as documented in section 5 of the Program Plan. For each question/comment received, the summary identifies OPEIC’s response, the industry sector(s) of the stakeholder(s) posing the question, the number of stakeholders that posed the question/comment, and whether an amendment has been made to the program plan in response to the question/comment. For ease of reference, questions have been grouped according to the corresponding section of the program plan. Unless otherwise indicated, stakeholder comments have been transcribed verbatim.

Section 3: Appointment of Stewardship Agency			
#	Sector	Question/Comment	Response
3.1	Environmental NGO	A Board with industry representatives is an efficient system for many aspects of governance but the program lacks a mechanism that is BC-specific looking at both the level of service offered in BC and the achievement of environmental outcomes. We recommend the creation of a committee with a wide range of stakeholders including reuse and repair organizations, recyclers, local governments, First Nations and environmental NGOs. This committee should be empowered to effect change for the BC program.	The program currently works with several organizations and committees including First Nations and environmental NGOs. OPEIC is currently part of SABC (Stewardship Association of BC), which is a coalition of Extend Producer Responsibility (EPR) organizations from across BC, working together to promote and manage responsible “end-of-life” programs for obligated products. Together, we aim to enhance and oversee responsible "end-of-life" programs for obligated products. This involves working alongside government entities, service providers, and stakeholders to ensure the success of BC's EPR model. Our goals include expanding accessibility, reducing landfill waste, and educating BC residents to support a circular economy for consumer products at the end of their lifecycle. Additionally, OPEIC participates and partners with FNRI (First Nations Recycling Initiative) and IZWTAG

			<p>(Indigenous Zero Waste Technical Advisory Group), to help provide recycling options for First Nations communities in BC. The OPEIC program also consults with an advisory group called the Outdoor Power Equipment Institute - Canadian Task Force ("OPEI-CTF"), comprised of representatives from the industry sector with the specific goal of ensuring compliance with the regulation and achieving desired environmental outcomes.</p>
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3.2	Industry Association	There appears to be a relationship with Product Care but you work with CESA. Can you explain the relationships?	OPEIC contracts with a service provider, (previously CESA, now EPRA), for the collection, transportation, and processing of EOPE by collecting OPEIC's obligated products through their network. Product Care is also contracted to manage day-to-day operations and perform administration action on behalf of the program.
3.3	Industry Association	Is there any thoughts to potential folding under CESA for all services? An issue for education is that consumers don't really care about the different programs but want clarity on where to bring materials.	OPEIC is an independently approved steward that is governed by the outdoor power equipment industry to focus solely on the obligated products outlined under Schedule 3, section 2(1)(d) ("Electronic and Electrical Product Category") of the BC Recycling Regulation B.C. Reg. 449/2004 (O.C. 995/2004). The utilization of contracted service providers supports the OPEIC stewardship model to ensure the program's obligated products are properly managed under today's regulations.

Section 4: Products Covered Under the Extended Producer Responsibility Plan

#	Sector	Question/Comment	Response
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4.1	Environmental NGO	<p>The intention behind regulating these products was to prevent them from being improperly disposed and to make it easy for the end users to responsibly dispose of them (as well as to foster design change). We appreciate that OPEIC accepts a range of products regardless of type of end user or if the manufacturer no longer exists or makes those products. Though not in the regulation, we encourage OPEIC to accept the full suite of products that its producers sell (i.e. those that are powered by fossil fuels and not just electric ones).</p>	<p>As noted in the question, fuel-powered products are outside the scope of BC's Recycling Regulation. Schedule 3 of the BC Recycling Regulation addresses "Electronic and Electrical Products". Included under this category are "snow blowers and mowers and other gardening tools" (see section 2(1)(d)(5)), which are the focus of the OPEIC program. Fuel-powered OPE are not covered under the Regulation and are consequently not part of the OPEIC program. Questions regarding the scope of product coverage under the Regulation is outside the purview of the program and should be referred to the Ministry.</p> <p>Consumers may recycle fuel-powered OPE through the extensive network of private scrap metal collection facilities located throughout the province. OPEIC conducted a study demonstrating that fuel-powered outdoor equipment is being responsibly managed by the private scrap metal recycling industry and has been so for decades. Creating a stewardship program for outdoor power equipment would be costly to industry and consumers with no additional environmental benefit.</p>
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Section 5: Stakeholder Consultations

#	Sector	Question/Comment	Response
5.1	Environmental NGO	<p>The draft program plan should be updated. It is unclear if the general public is encouraged to participate in the stakeholder consultation. An effort should be made to meet the people where they use or buy the products, not just at the</p>	<p>The consultation is open to all stakeholders and people of interest. Notice of consultation was posted within various locations including the OPEIC website and distributed through various channels such as RCBC.</p>

		<p>collection sites, since limiting consultation to the collection site, they are only capturing people who already know of, and use, the program.</p> <p>The current engagement process should capture populations that are underserved by the program, and engage with those that do not speak English as a first language.</p>	<p>OPEIC actively engaged the First Nations communities through the FNRI partnership (First Nations Recycling Initiative) by informing all interested parties and the public of the consultation process, which underscores a continued commitment to include all parties of our outreach. OPEIC only carries out the consultation in English but can work with individuals who may need assistance in finding translation solutions.</p>
5.2	Local Government	<p>Thank you for the opportunity for feedback on your Program Plan. I hope the renewal process will provide the opportunity for this very important program to improve.</p>	<p>Thank you for taking the time to provide feedback on our Program Plan renewal. We value all input, and we're committed to strengthening the effectiveness and impact of our program. Insights are invaluable as OPEIC strives for continuous improvement.</p>
5.3	Local Government	<p>To clarify, is the "consultation" plan the one from the OPEIC website, last amended February 19, 2020?</p>	<p>Yes.</p>
Section 6: Collection System and Consumer Accessibility			
#	Sector	Question/Comment	Response
6.1	Environmental NGO	<p>The creation of a one-stop shop collection network is appreciated. We support collection locations being available in all urban and suburban communities as well as all rural communities where these products are sold. We do not agree with the Stewardship Association of</p>	<p>Part 3 of the BC Recycling Regulation applies to products that are not managed under an approved stewardship plan. The OPEIC program operates under Part 2 of the Regulation and adheres to the SABC Accessibility Standard followed by other approved stewardship programs. Therefore, the accessibility</p>

	<p>BC's (SABC) definition of rural community being populations of 4,000 -30,000 and exclusion of smaller communities (those under 4,000). The SABC standard has not been developed in consultation with local governments nor the public, nor does it meet the intent of the Recycling Regulation and so should not be used as a measure of accessibility. We do not agree with the OPEIC criteria for reasonable access. Instead, programs should provide service in all municipalities and if no service provider can be contracted, the program itself should set up the collection depot. The program should work with the BC Product Stewardship Council and the Indigenous Zero Waste Technical Advisory Group to determine the underserved communities. The 2022 Annual report shows only 5 regional districts out of 27 even have one location that will accept lawn tractors. The target for coverage should be that 100% of the total population has access to either a collection depot, pick up option or a mail-back system (free of charge to the end user) for all types of products (handheld, bulky and lawn tractors). We concur with the Ministry that "OPEIC must also work with the producers and retailers to meet this provision for direct on-line sales to rural locations". The plan should analyze its accessibility with full coverage in mind and that should identify the current gaps. A target of 2026 for full coverage is recommended given the program has already had four years to fill in current gaps.</p>	<p>provisions under section 11(3) of the Regulation do not apply to electric outdoor power equipment. Additionally, it is inefficient for the use of consumer-supported funds to set up collection facilities if there is not the demand or volume to support a dedicated collection facility. That is why OPEIC offers dedicated pick-up services through community events to provide 100% coverage of the obligated products. Please also review the response, 3.1 above to learn about our work with indigenous communities. Another factor that the program competes with is the scrap metal system as obligated products, i.e. lawn tractors, contain large amounts of intrinsic value for consumers who may reside near a scrap yard versus a contracted collection facility.</p>
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		<p>We recommend that collections and sales should be measured per unit. This will avoid issues where products change weight (usually becoming lighter) and allow for a more accurate measurement of recovery rate. OPEIC should clearly state unit sales per category, units collected per category and should also publish the average lifespan of each product category in annual reports. Data on battery collection should be tracked and published.</p> <p>OPEIC should participate and fund appropriately all solid waste composition studies that local governments and First Nations conduct, not just the few that SABC commits to.</p>	<p>OPEIC reports unit sales by product category and estimate the number of units collected within the published annual reports. The processors of electronic waste, like other waste processors use weight in Kilograms and tonnes within their everyday standard business practices, rather than unit piece counts. Counting and categorizing every unit collected would be very disruptive to the entire processing chain and extremely cost-inefficient. To estimate the total number of units of EOPE collected, the service provider’s processor is required to conduct a piece count sampling of the collection containers received at the processing facility during the preceding month. This sampling process identifies and documents the quantity and weight of products contained within each collection container. The processors submit monthly sampling reports of the collection material processed, indicating the number of units of EOPE that were found in the sample each month. Additional information on battery management can be found within the OPEIC annual reports.</p> <p>OPEIC’s program plan commits to participating in all waste composition audits conducted by local governments that SABC members participate in. Local governments utilize waste composition audits as the means of determining the breakdown of materials in their landfills and at a frequency they have determined satisfactory to evaluate their waste composition.</p>
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	<p>The program should list all of its sites in the plan. In addition to having listed sites, the program should use a secret shopper service to see if the listed sites are actually accepting the materials. Users of other programs have had experiences where staff at listed sites have said they do not accept the materials, showing the need for better coordination and possibly staff training, particularly for the retail locations. Customer experience should also be evaluated. The program should set a goal of 100% collection of end-of-life EOPE and work towards it with interim targets.</p> <p>OPEIC should assess the convenience of accessing depots through surveys similar to the one conducted by the Ministry in 2018.</p> <p>The 2018 BC survey noted 20% of the public had recycled their EOPE and 5% had thrown it in the garbage; 37% of residents found recycling outdoor power equipment very convenient and another 39% found it somewhat convenient. While OPEIC has developed contracted sites and increased that number since 2018, a target to raise this number as well as a commitment to conduct an annual survey to measure it would be useful. When asked why these items may have been thrown in the garbage, 32% did not know the item was recyclable), 34% did not know where to take it and a significant 23% said there was nowhere to take it or no way to get it there.</p>	<p>We currently list all collection sites participating in the program in our annual reports. As sites open and close, details can fluctuate, and we do not deem it necessary to list them in the Program Plan. The latest OPEIC annual reports can be found here.</p> <p>Thank you for sharing information on a 2018 BC survey. OPEIC regularly conducts consumer awareness surveys every two years in collaboration with other EPR programs in BC. The most recent survey showed that 67% of British Columbians are aware of recycling options for electric outdoor power equipment in the province. The next survey is planned for autumn 2024.</p>
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		This shows some key areas the program plan should address.	
6.2	Industry Association	OPEIC contracts Product Care as the administrator and CESA as the program provider. Without CESA, OPEIC would not provide any collection services of their materials in BC. It is unlikely OPEIC will develop separate collection sites and the potential of OPEIC only depots is not indicated in their evergreen Plan.	Within the OPEIC approved Program Plan it highlights continued commitment by OPEIC to move from a free market system (collection of products through the existing scrap metal system) to a traditional stewardship model of utilizing collection depots, and in this case, by contracting with a service provider who has business relationships with collection facilities. OPEIC expands beyond current service provider collection facilities by hosting collection events and direct pick-up services which are all included within the Program Plan.
6.3	Local Government	Evergreen EPR Plan: In general, an evergreen approach is preferable for local governments, since only selected modules are updated. This allows interested parties to focus only on new or different material. In this case (Plan dated: Submission May 29, 2019 and Amended February 19, 2020), however, elements of the plan are out of date (e.g., quotes of the Recycling Regulation on page 6 have not been updated to the current language after amendment) and the collection approach described on page 15 does not reflect the current system which co-mingles "regular" and "bulky" products. It may have been preferable to re-draft the plan with an evergreen model similar to the one used by Tire Stewardship BC and identify specific modules for this consultation,	OPEIC operates an "evergreen" stewardship model which is designed for continuous plan improvements and allows the program to adapt and innovate within the evolving recycling marketplace. Approval timelines are critical to a plan to properly address its stated objectives - by utilizing an evergreen plan it allows OPEIC to continue to innovate its collection program and implement processes that have already been reviewed, consulted, and approved. Addressing plan requirements, targets, and goals remain a program core focus, with ongoing continuous improvements that are acknowledged and formally accepted within the program annual reports. OPEIC is achieving its planned goals and has made significant improvements in various areas. The current plan could always include information that may become irrelevant, that's why the plan also states that OPEIC will meet or exceed any

		which would have been more straightforward for those reviewing the plan.	prior goals, which adapts with an evergreen plan model.
6.4	Local Government	<p>Many communities have access to curbside residential garbage collection which is a very accessible disposal option. It is important that EPR programs acknowledge that this is their toughest competition for collecting products and act accordingly. It should not be substantially more difficult to access recycling through a stewardship program than it is to dispose of an item in curbside garbage. With current limitations to accessibility, consumers may be inclined to take the easier option and simply place their stewardship material in the garbage, which has concerning potential consequences such as fires in collection vehicles or at solid waste management facilities. OPEIC and stewards of other electronic and battery-operated products need to work together to find innovative solutions for collecting their products that overcome desire for consumers to put your products in the garbage. More highly publicized collection events organized and facilitated by stewards is one option to explore in addition to providing residential collection services.</p>	<p>The program currently has an accessibility rate of 98%. Transitioning from a market-driven model to a collection system, it now operates through over 230 collection sites. Notably, many of these sites also collect various other stewardship products, further enhancing the efficiency of this collection system. Collection events throughout the province also bolster the accessibility of the program, which is communicated by both OPEIC, and its contracted service providers. EOPE products often come in various sizes, and many are quite large, typically too large for standard residential garbage bins which aids in the support of consumer consideration of proper recycling.</p>
6.5	Local Government	<p>It is encouraging that OPEIC is partnering with other stewardship organizations. These relationships should continue to be developed to make recycling for all electrical and battery-operated products easy and intuitive for consumers. I highly recommend striving further to develop relationships and collection</p>	<p>Thank you. OPEIC continues to explore partnership possibilities with related stewards and organizations.</p>

		<p>partnerships with additional related stewards such as Call2Recycle and Electronic Products Recycling Association.</p>	
6.6	Local Government	<p>I am from the Cariboo Regional District which covers over 80,000 square km in central BC. OPEI does not have a single drop off location in our Region.</p> <p>Many of OPEI items contain batteries or residual fuel, which can result in fires, especially when incorporated into scrap metal piles. These items require our refuse sites to take special care with them, in an attempt to limit fire events.</p> <p>To date we have not partnered with OPEI as there are no financial incentives to do so. Has OPEI completed a Cost Study? If so, how does the study show that the program is covering the cost of managing these items?</p>	<p>Area's known as gap areas or regions can exist due to a multitude of marketplace variables. The OPEIC contracted service provider has been organizing collection events in these gap areas across BC. These events, along with their locations, are recorded within the OPEIC annual reports, providing the number and location of collection events across BC, which includes the Cariboo Regional District.</p> <p>The OPEIC program focuses only on batteries since the program deals exclusively with electronic outdoor power equipment and safety remains a top priority. To mitigate any risks associated with battery-embedded products or removable batteries, specific handling procedures are communicated. In instances where batteries are dropped off separately, collection facilities have been instructed to take necessary safety steps such as taping terminal ends to minimize any potential hazards.</p> <p>Collection sites are compensated through our service provider who has developed and consulted on a Cost study, which has resulted in appropriate adjustments accordingly.</p>

Section 7: Consumer Awareness			
#	Sector	Question/Comment	Response
7.1	Environmental NGO	<p>It is good news that OPEIC has improved its consumer awareness through the actions noted in its annual report but a goal of 70% is no longer suitable. Given the rise from 29% in 2017 to 67% in 2022, the goal should be to get 95% of the population aware of the program by 2029 (and later 100%) with work done to increase awareness of the full range of products accepted. To do otherwise is to continue to externalize costs to the public and the environment.</p> <p>Also note that many EPR programs do not have, or do not have easily accessible, materials in languages other than English that address different users of their program. Any residents who do not speak English are not able to easily participate in the programs. Based on the 2016 Census, 15% of BC Households speak a non-official language at home, so would need EPR materials and information to be translated into a different language to be aware of a program (let alone participate). This is especially important for</p>	<p>The program will work towards achieving the target of 70% awareness amongst those who have purchased OPE. With the awareness level of 26% from OPEIC's 2017 consumer awareness survey serving as a baseline for assessing improvement in consumer awareness, a 44% increase in five years represents an ambitious target for the program. Refining the target to focus on actual owners of the product effectively increases the significance of the awareness value because the percentage of the BC population that owns EOPE is relatively small. Additionally, for long-lasting durable goods that are used by only a segment of the population, 70% awareness has shown to be an exceptional rate of awareness for mature and successful programs.</p> <p>In terms of language accessibility, technology has provided the capability of the OPEIC website to be translated into many other languages via common web-browsing translation tools (e.g. Google Translate).</p>

		<p>the programs that need consumer/resident participation such as this one.</p> <p>The use of an annual survey with more detailed analysis for certain products or audiences should be done after new campaigns to determine if they were effective or if they should be adjusted. This should include for materials in other languages to see if they reached the targeted audience and were effective.</p> <p>Programs should adequately fund RCBC's hotline and app with additional funds to help streamline and correct information. No strings should be attached to this funding with regards to RCBC's other activities to work towards zero waste, which should be supported.</p>	<p>OPEIC actively participates in the bi-annual SABC survey conducted for all BC EPR programs.</p> <p>OPEIC is also a contributor to RCBC for services such as their phone hotline.</p>
7.2	Industry Association	<p>In terms of awareness it is not helpful to consumers to have OPEIC providing educational promotion as a fully separate entity from CESA. As stated in the response to consultation, OPEIC operates their own consumer webpage to 'provide performance metrics'. As well 'OPEIC will be responsible for its consumer awareness activities under the new program plan.' The Plan does point to working with CESA on some promotion activities while keeping separate for core educational activities.</p>	<p>OPEIC and its contracted service providers are separate businesses with their own governance, board of directors, members, and leaders. There are many EPR organizations within BC, of which OPEIC is among. Just as the other programs operate their own brands and governance, so too does OPEIC. BC does not operate under a municipal or other harmonized/universal recycling system, rather, each EPR organization is governed by members and a board of directors that is specific to the industry. The work that OPEIC does with its service providers is on a co-op partnership basis, as the programs have found</p>

			synergies that allow them to promote through collection and awareness events.
7.3	Industry Association	<p>Running a separate education campaign from CESA is confusing to consumers. Electrorecycle is the better webpage and brand for customers to understand recycling appliances and electrical equipment. Presently no OPEIC products are listed on the Electrorecycle webpage. CESA collects more types of items and Electrorecycle is naturally a site for online research on how to take back electronic items. Outdoor electrical equipment should be promoted with CESA products to streamline understanding with consumers rather than under a different banner under a separate webpage. Ease of understanding and ability to find information by consumers must be paramount. Consumers don't care about the back end. The Plan should require that, instead of brand awareness for individual Stewards, that OPEIC products will be branded for drop off under Electrorecycle to promote a unified portal for consumer information. It should not matter that residents are aware of OPEIC. Rather it should be a focus to pool educational resources to promote greater electronic recycling. That is more important than separate brand awareness. This focus on joint education and awareness should be reflected in the Plan and direct OPEIC to work with CESA on unified recycling awareness.</p>	Please see response to 7.2 above.

7.4	Anonymous, webinar	In terms of reporting on engagement does OPEIC also consider CESA website or in person engagement as it relates to your products? Do you count towards both programs or are they completely separate?	When referring to engagement, OPEIC exclusively considers the metrics outlined in our own marketing reports, such as website sessions, impressions, clicks, video views, conversions, etc. We specifically focus on activity within OPEIC's website and marketing campaigns. OPEIC does not track activity occurring on any service provider's websites. However, all visits to OPEIC's website, including those originating from outside websites, are accounted for in our metrics.
7.5	Anonymous, webinar	In your next consumer awareness survey would you consider asking residents if their purchase of an EOPE product was to replace an old EOPE item, or a gas powered one?	OPEIC participates in the Stewardship Association of British Columbia ("SABC"), a consortium of EPR programs in the province that work together on common issues and synergies. Consumer awareness surveys are conducted every 2 years to determine the awareness amongst British Columbians about recycling stewarded products. We will take the suggestion under advisement for our next survey.
7.6	Industry Association	We see the same issue with beverage containers and beer with lack of clarity for some depots not working with both. Can you speak to working and harmonizing education campaigns and service with other EPR programs?	While many stewardship programs aim to collaborate where synergies exist, practical constraints such as limited space and regulatory requirements at some collection sites often prevent the realization of a one-stop-shop approach. Despite this, there are instances of successful collaboration. For example, OPEIC continues collaboration with its service providers by moving towards a more centralized system compared to the previous market-driven approach. Additionally, joint collection events are often organized in partnership with our contracted service provider and other electronic stewardship programs, focusing on

			similar product categories. Where opportunities exist and when it makes economical business sense, then OPEIC would welcome any collaboration.
Section 8: Management of Program Costs			
#	Sector	Question/Comment	Response
8.1	Environmental NGO	<p>The program should plan to enhance its differential, or eco-modulated, fee system based on certain criteria such as lifespan, repairability, use of easy to recycle materials, etc. to drive product design change as intended by the Canadian Council of Ministers of Environment. Differential fees should be part of the product cost and a driver for producers to make changes. There is no need for them to be visible to the consumer just as many other producer costs are not itemized on a receipt. The fees should also be set at a higher level to pay for the improvements needed in understanding collection rates, providing more comprehensive collection networks, enhancing awareness and fulfilling the mandate for redesign and reuse.</p> <p>The key way to measure if the contracted service provider is offering suitable fees for service is whether or not the program is able to offer service in each community with service providers that are not required to subsidize the program themselves (as many local government depots do to ensure service exists). The studies conducted on costs failed to factor in the need</p>	<p>The OPEIC program currently employs varying fees across multiple product categories, with pricing decisions influenced by several factors. Pricing structures are primarily shaped by market demand; presently, there is greater demand for hand-held EOPE compared to larger EOPE. Additionally, the fees are influenced by the costs associated with managing these products.</p> <p>In terms of fee visibility, there are no restrictions or limitations on the display of Environmental Handling Fees (EHFs) in BC. Manufacturers, retailers and wholesalers may include the recycling EHF in the product price or display it as a separate charge to purchasers. OPEIC is in no position to mandate such a request.</p>

		<p>to be open a certain number of hours for consumers to see it as a viable option. Just like stores are not only open for the number of hours in which all sales occur, return facilities also need to be open more than the time it takes to collect items in order to be convenient to those returning items. We recommend the same hours be provided as noted in the Recycling Regulation for producers choosing not to join a collective plan. Consideration for recent costs increases to depots for retaining staff and inflation should be factored in.</p> <p>If OPEIC cannot find a partner willing to provide a service in a community, it should set up its own depot in that location and pay the costs that are required.</p>	<p>Requesting a collection site to change their hours is not an option of OPEIC to pursue since the collection site is an independently owned facility. These collection sites have set their hours to suit their business's needs and to meet the needs of their customers and residence.</p> <p>OPEIC has opted to contract with a service provider to utilize their extensive collection system, which comprises over 230 sites across BC. In addition to collection facilities, OPEIC hosts numerous collection events to service communities all across BC.</p>
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Section 9: Management of Environmental Impacts

#	Sector	Question/Comment	Response
9.1	Environmental NGO	Reduce and Redesign:	The program employs varying fees across multiple product categories, with pricing decisions influenced

	<p>The program should work on the use of differential fees to drive product design change. While the work the industry is doing to improve products is noted in the program plan, it is unclear what feedback mechanisms and engagement strategies, if any, the program is pursuing to actively shape changes and have producers understand the barriers to moving some of the products up the hierarchy. The program should also report on what changes happened as a result of program advocacy and actions, not just what is happening in general, often as a result of legislation and regulation. This should be a key role of the program.</p> <p>Reuse, Repair and Refurbishment: The program should work to encourage and report back on the actions the producers are taking to use reusable packaging (report on number and amount of packaging, percentage of total sales of EOPE using this, etc.).</p> <p>The program should work to recover parts from returned items and use them or make them available for repair. Support for repair and maintenance should be part of the program plan and the barriers noted can be overcome with support of the program. Should the program not</p>	<p>by many factors. The fees are also influenced by the costs associated with managing these products. The program reports out active industry efforts that impact environmental affairs, however, OPEIC is unable to dictate manufacturing trends that rely on global efficiencies. The program is only responsible for complying with the Recycling Regulation.</p> <p>We currently report annually on efforts taken by producers/participants to reduce the environmental impacts of their products through improvements in product design. We rely on our industry participants to advise OPEIC on environmental impacts. Some producers and participants of our program provide reconditioned electric outdoor power equipment for sale, as well as offering repair parts and services via a user-friendly website directly accessible to consumers.</p> <p>OPEIC supports a dealer repair network that helps extend the lifespan of EOPE products. Our program is specifically designed to handle these products once they've reached the end of their life.</p>
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	<p>take the lead in redesigning its products, the provincial government.</p> <p>Recycle: The program should aim to increase the amount of materials that are recycled, including working with producers to address issues that limit recycling of products.</p> <p>The program plan should advance upon what was stated in the 2020 program plan assuming the actions noted in that plan have occurred.</p> <p>A suitable process for safe management by the program of batteries in all products, including bulky items, should be mapped out (themselves or with senior government) may wish to explore regulations being pursued in other jurisdictions</p>	<p>The program is committed to ensuring that our products are collected and recycled. We achieve this through various campaigns targeting EOPE consumers across BC and by collaborating with our Producers through the CTF advisory group (referenced in response 3.1), to address any mutual issues or concerns. The OPEIC annual reports include information detailing the management and recycling of materials, including a breakdown by material type and the specific methods used (reuse, recycling, etc.). You can access these reports here. For details on the seasonal influence on EOPE sales and how it impacts on our collections, please refer to response 11.2 below.</p> <p>The Program Plan approved in 2020 includes the amendments made by the Ministry. Additionally, the feedback from the Ministry, received after this plan's submission, has been integrated</p> <p>We currently report battery and bulky product management in our annual reports every year. You can find the latest annual report here.</p>
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		that require products to last a certain length of time, come with mandatory warranties of longer terms, have availability of parts, are designed for repair, and have access to repair or servicing.	
9.2	Local Government	Thank you for the opportunity to participate in your Extended Producer Responsibility (EPR) Plan Renewal Process. This program has an important role to play in the responsible collection and management of end-of-life electrical products. A particular item of concern for products included in your program are batteries which pose a potential fire hazard in waste collection vehicles and at waste management facilities.	<p>Thank you for your participation and input.</p> <p>Our products currently meet safety standards for batteries and other requirements. In accordance with the requirements set out in the RQO Electronics Recycling Standard, the service provider’s primary processors remove batteries from Program Products and send them to an approved downstream processor where base materials are extracted and commodified. Please also see response to 6.6 above for more details on battery management.</p>
9.3	Local Government	What research have you done to determine lifespan of these products?	Extensive research efforts have been undertaken, with results varying significantly depending on the manufacturer and product category. For instance, comparing the lifespan of a trimmer used weekly during the spring, summer, and early fall months to that of an electric chipper reveals substantial differences due to varying usage patterns. Furthermore, as a standard development organization within the industry, OPEI plays a pivotal role in establishing safety and mechanical standards for electric outdoor power equipment, including customized life tests for each product category. However, lifespan can also be influenced by factors such as the specific product category and its intended user base, whether it is

			targeted towards professional landscapers or homeowners.
9.4	Local Government	Your reported sales were in the 10,000's and your collection was in the 1,000's. How do you explain this gap?	The OPEIC program is a niche program, and its collection trends differ from those of other programs with products of a short lifespan, such as packaging. Because of the extended lifespan and the impact of weather on the use of EOPE, sales may not directly correlate with collections, leading to fluctuating gaps between what was placed on the market and what was collected in a given year.
9.5	Anonymous, Webinar	It comes back to the gap between your sales and collection. If you want to continue to say that it is due to lifespan, and repair and passing down of products then you need more than just the industry reps stating so, you require some research to prove this.	<p>Analyzing the numbers can offer valuable insights into market trends. This delay often occurs because consumers are extending the lifespan of their products, especially when they can purchase other tools from the same manufacturer that use the same battery and charger. This creates a platform of outdoor power equipment that can be shared among various products, maximizing their utility. We may consider conducting additional surveys as part of our marketing efforts to delve deeper into this.</p> <p>It is also important to consider that the relationship between sales and what's collected isn't straightforward. A product in the hands of a consumer isn't considered waste until they decide to dispose of it. Thus, it's possible for electric outdoor power equipment to sit unused in storage locations when it no longer meets the consumer's needs. When analyzing metrics, it's crucial to note that the program's success lies not just in diverting materials from landfills, but also in understanding the various paths these materials take. This includes factors like repair and consumer behavior until they deem the product unwanted. These</p>

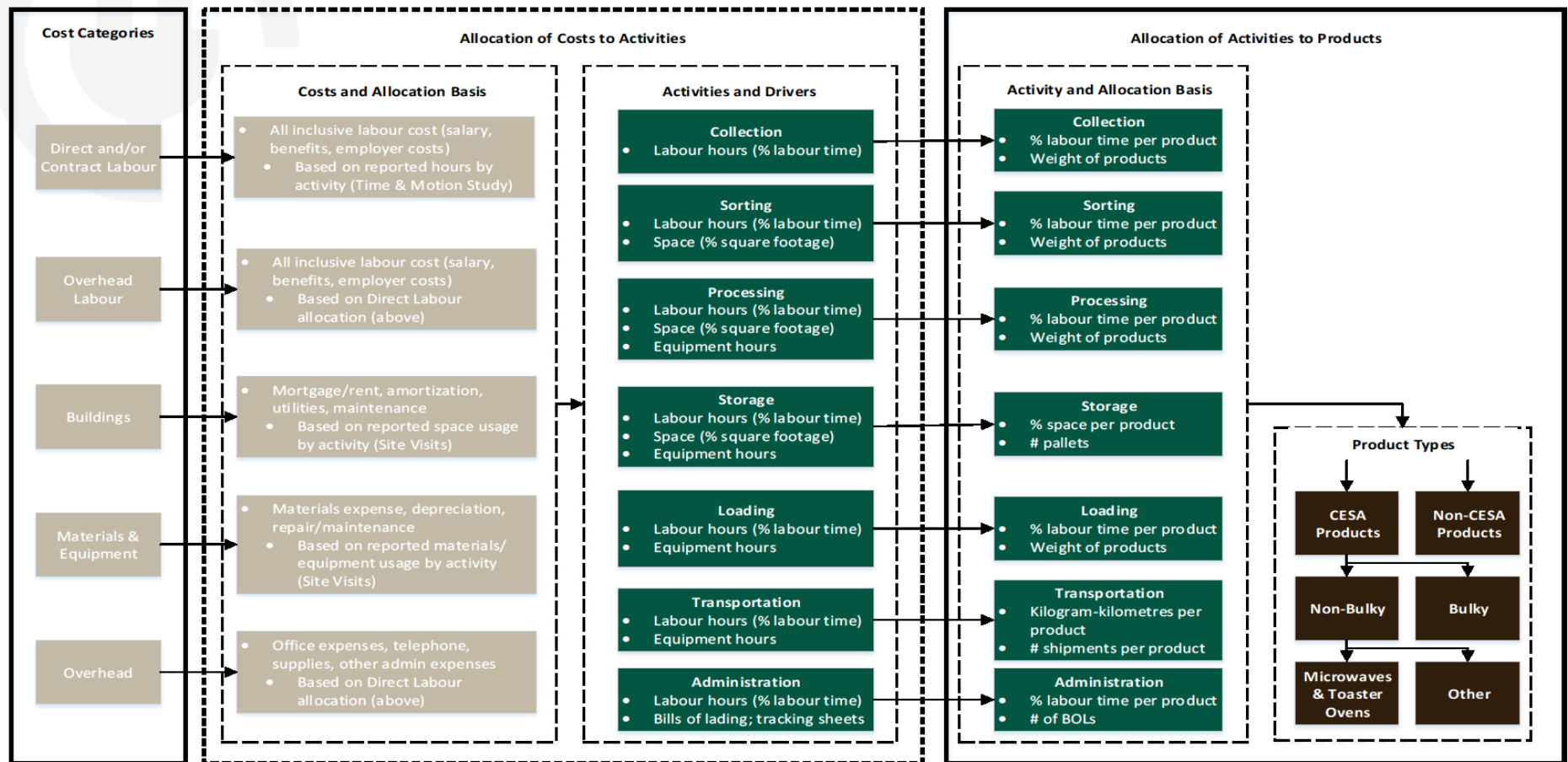
			aspects should be factored into the overall assessment process. As part of our program commitment, we also conduct waste composition audits to ensure our products are not ending up in landfills and that consumers are either storing them, reselling, repairing or recycling the products.
9.6	Anonymous, Webinar	If repair is such an important part of your program, would you consider asking dealers to report on the number of repairs actually completed?	Not all dealers are part of the OPEIC program as some sell fuel powered outdoor power equipment, but they may repair all outdoor power equipment. Consider a scenario where a manufacturer produces various products, yet a specific dealer may not participate in the program due to exclusively selling fuel-powered options. However, under their contract with the manufacturer, they may be obligated to repair items across the entire spectrum of the manufacturer's offerings. Encouraging such dealers to actively participate and report on items, despite not being program members, presents a considerable challenge.
Section 11: Performance Measurements Summary and Reporting Commitments			
#	Sector	Question/Comment	Response
11.1	Environmental NGO	In general, the targets and reporting measures have been detailed above. Any reporting that can be third party audited should be to assure accountability and transparency. Reporting should include all events and engagement with producers that aim to change	OPEIC annual reports are audited every year as per BC Regulation. We contract a third party to conduct both non-financial and financial audits. Their findings can be found in the appendices of our annual reports, found here .

		<p>design and product delivery systems to reduce the environmental impacts. Results of the engagement should be reported as well.</p> <p>The number and location of contracted sites by municipality and RD should be provided as well as a list of any municipalities that do not have a permanent depot. The population with access to collection should have a target of 100%, with all municipalities served as well as any First Nations locations as determined in conjunction with the First Nations.</p> <p>Program costs should also be reported compared to the value of product introduced into the market annually. Efforts should be made to quantify the costs that remain externalized to others (such as depot operators, local governments, illegal dumping clean-up efforts, and the environment) and attempts made to rectify this.</p> <p>As noted, efforts to reduce environmental impacts should be significantly strengthened and then targets set for the amount of reuse, repair, refurbishment and use of parts.</p>	<p>We provide a list of all contracted collection sites by location, every year in our annual reports and identify gap areas. See link to annual report above.</p> <p>The program revenue and costs are reported in our annual reports every year.</p> <p>Setting targets or monitoring this aspect would not be practical. Some of our participants and their dealers have established their own refurbishment or repair systems. Additionally, individuals could utilize repair cafes, undertake DIY repairs, or acquire used EOPE through shared marketplaces.</p>
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		<p>The program plan should provide significant advances needed to reach the potential of EPR programs as envisioned in the CCME plan. We hope that this information is helpful in crafting the renewed plan.</p>	<p>Thank you for the recommend advances. OPEIC continues to exceed requirements of the program and strives to meet our stakeholder’s interest.</p>
11.2	Local Government	<p>Performance Targets: On page 37, the plan says “Set appropriate metrics and collection targets for regular and bulky products after the third full reporting year”. Since the Plan was approved in 2020, the program would have 3 years of data (2021, 2022, and 2023) upon which to base this target setting activity. Recognizing that setting reliable recovery targets may be challenging for this product category, perhaps investing further in product studies which show that obligated materials are not ending up in the garbage or other undesirable locations may be an alternative approach to the traditional performance targets.</p>	<p>We appreciate that you acknowledge the difficulty of setting reliable recovery targets for EOPE. Defining appropriate metrics or even targets for electric outdoor power equipment is presented by challenges and may not provide a comprehensive representation of program performance for EOPE, considering factors such as the lifespan of our products, seasonal and weather influences on sales, and the growing trend of repairing, reusing, and reselling equipment. Over the past three years, data reveals a slight cyclical trend with fluctuations in both the weight and number of EOPE units collected. As part of our commitment, we conduct waste composition audits to ensure our products are not ending up in landfills and that consumers are disposing of them responsibly. Nonetheless, exploration of such metrics will continue to be reviewed and innovative feedback is welcomed.</p>
11.3	Local Government	<p>Your program plan renewal has noted the “evergreen” stewardship model, which I understand involves no changes to the plan previously approved in July 2020 and is designed for continuous program improvements. This approach with this particular plan is very concerning considering the numerous deficiencies noted by the Director and</p>	<p>The Program Plan approved in 2020 includes the amendments made by the Ministry. Additionally, the feedback from the Ministry received after this plan's submission has been integrated.</p>

		<p>his respective amendments referenced in the program approval letter (Reference: 353033). I would expect at a minimum, a commitment to continuous improvement would include an updated program plan that acknowledges the deficiencies of the previous one and incorporates the amendments provided by the Director.</p> <p>It is also very concerning that there does not appear to be an adequate commitment for reporting program performance pertaining to the number of individual units collected in the program as opposed to an aggregate tonnage.</p>	See response to 11.2 above.
11.4	Local Government (1)/Industry Association (1)	Will the amendments from the Ministry be incorporated into the Plan itself, rather than presented as a separate letter?	The Program Plan approved in 2020 includes the amendments made by the Ministry. Additionally, the feedback from the Ministry received after this plan's submission has been integrated.
11.5	Local Government	The existing plan describes reporting for regular products in weight and bulky products in units, so this will continue?	Since both streams have now combined, we plan to report the estimated weight and units for all Program Products.

Appendix C: Analysis & Cost Compensation Model⁵



⁵ This image illustrates the analysis and cost compensation model of OPEIC's previous Service Provider (CESA). Due to the amalgamation with CESA and the active Service Provider (EPRA), operational changes took effect on January 1, 2025.



Canada