



File: 50340 – 40/PCA/PLAN

July 16, 2007

Mark Kurschner
President
Product Care Association
12337 – 82A Avenue
Surrey, BC V3W 0L5

Dear Mark:

Thank you for submitting on October 6th, 2006, the Product Care Association's Product Stewardship Plan, as required by section 4 of the Recycling Regulation and the supplementary letter of July 5, 2007.

I have completed my review of the plan and the supplementary information and am satisfied that the plan meets the requirements of the Recycling Regulation and hereby approve the plan, with the exception of the residual container management requirement (section 5(1)(c)(ii) of the Recycling Regulation). Please be advised that this approval does not extend to any materials or content contained in the plan that are extraneous to the requirements of section 5 of the Recycling Regulation. Ministry staff will follow up on the residual container management issue and an amendment to the October 2006 Product Care Association's plan and/or July 2007 supplementary letter may be required.

My approval comes with my understanding that your plan contemplates new targets, performance measures and strategies for which you must first establish a base from which to continuously improve. My expectation is that as you move from the planning stage to implementation, and reach key milestones, you will report these to the ministry in your Annual Report as required under section 8 of the Recycling Regulation.

I look forward to working with you to ensure the success of this program.

Sincerely,

Hu Wallis
Director

JW/kw



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July 5, 2007

Mr. Hu Wallis
Director, Environmental Quality Branch
Ministry of Environment
P.O. Box 9341, Station Provincial Government
Victoria, B.C., V8W 9M1

Dear Mr. Wallis:

Re: Product Care Product Stewardship plan- supplementary information

We provide you with the following supplementary information with respect to Product Care's 2006-2011 Product Stewardship plan:

1. Planning Priorities for 2006-2011:

- a) **Collection System- Access:** Product Care commits to the increase in the number of depots and paint plus depots and collection events with an emphasis/priority to service remote areas and areas brought forward during the plan consultation as follows:

	<u>Paint Depots</u>	<u>Paint Plus Depots</u>	<u>Total Number of Depots</u>	<u>One Day Events</u>
2006	60	43	103	14
Target 2007	60	45	105	13
Target 2008	62	47	109	12
Target 2009	64	49	113	12
Target 2010	66	51	117	12
Target 2011	68	52	120	12

b) **Management of Collected Materials**

Target for 2011	<p>Increase volume of paint managed by reuse or recycling by 4% per year to 85% in 2011 (2005= 65%).</p> <p>Maintain policy of no program products going to landfill.</p> <p>Increase number of depots offering “paint exchange” by 4 % per year to 90% (2005=70%).</p>
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c) **Collection of Containers**

Target for 2011	<ul style="list-style-type: none"> • Maintain rate of 100% recycling of metal and #2 plastic paint containers. • Maintain rate of 95% of #5 plastic paint containers and flammables plastics containers managed for energy recovery. • Maintain rate of 100% of plastic and metal gasoline containers being recycled. • Identify options/technology for recycling pesticide container
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d) **Program Performance – Management of program costs**

Target for 2011	
Program Performance	Maintain a minimum 4 % increase per year of total collected volumes for the paint product categories.

2. **Containers:**

With regard to specific non recyclable packaging issues:

- **Flammable products- plastic containers-** current management option is to energy recovery, except for chlorinated plastics which are disposed in landfill. Identified challenges to improving the management options are:
 - unwashed plastic generate gases during processing which are unacceptable to recyclers for health and safety reasons.
 - technology not available to clean the plastic prior to recycling without creating wash water waste that cannot be discharged
 - generally, there has not been enough volume to warrant technology development.
- **Flammable products- #3 chlorinated plastic packaging:** There are no available processors for #3 plastics, and they are not accepted for energy recovery.

- **Pesticide containers:** No recycling solutions have been identified for the volumes managed by Product Care. These containers are not accepted for recycling or for energy recovery due to health, safety and environmental issues regarding residual pesticide presence

3. Education and Awareness:

Copies of educational materials enclosed:

- Retail poster
- Retail brochure
- Paint Container Sticker
- Please refer to content of Product Care website www.productcare.org

Planning priorities and strategies:

Target for 2011	50 % increase in program awareness as measured in consumer survey compared to 2007
Strategy 2007	<p>Ongoing Communications elements</p> <ul style="list-style-type: none"> • Continue to promote paint can stickers to retailers • Identify and participate in Reuse websites • Continue to partner with RCBC for 800-hotline service and other services • Advertise in all available municipal waste calendars (9 municipal calendars in 2006) • Continue to partner with all municipalities willing to distribute consumer program brochures to householders <p>Specific Communications Elements</p> <ul style="list-style-type: none"> • Conduct consumer survey to establish consumer awareness level. • Redesign program poster and consumer brochure and distribute to 4,000 (est'd) BC retailers • Contact a minimum 20 municipalities/brandowners to request website link. • Advertise in 5 Yellow Pages publications
2008	<ul style="list-style-type: none"> • Perform “Ongoing Communications Elements” • place advertisements in 5 additional Yellow Pages publications

2009	<ul style="list-style-type: none"> • Perform “Ongoing Communications Elements” • place advertisements in 5 additional Yellow Pages publications • redistribute program poster and consumer brochure and distribute to 4,000 (est’d) BC retailers
2010	<ul style="list-style-type: none"> • Perform “Ongoing Communications Elements” • place advertisements in 5 additional Yellow Pages publications • Conduct survey to establish consumer awareness level.
2011	<ul style="list-style-type: none"> • Perform “Ongoing Communications Elements” • place advertisements in 5 additional Yellow Pages publications

4. Tools for Impacting Product Life Cycle Management:

By varying eco-fees with the size of a container will a ‘price signal’ is generated for the consumer. In the case of pesticides and flammables, the eco-fee rates vary based on the volume of the product within specified container size ranges. In the case of paint, a relatively lower eco-fee on the larger container size reflects the better utilization (i.e. reduction of left-over paint) by trade painters who generally use that size. This utilization recognition also functions as a tool for product life cycle management.

Planning priorities and strategies

Target for 2011	Participate in available Product Stewardship Institute studies regarding life cycle management of paint and other HHW.
	Review allocation of eco fee rates based on life cycle and other factors every two years beginning in 2007.

5. Targets, Performance Measures and Strategies:

Product Care will continue to track and report recovery rate for the following measures:

<u>Recovery rate of products:</u> litres recovered compared to litres sold in each calendar year
<u>Historical comparison:</u> recovery rate data presented on a year to year comparative basis.

<p><u>Waste audit participation:</u> participate in at least one municipal waste audit annually and report available data regarding program products.</p>
<p><u>Consumer awareness:</u> see Consumer awareness survey strategy</p>

6. Consultation:

Please review separate consultation synopsis document.

7. The Dispute Resolution Procedure and Compliance Process:

Compliance: Regarding compliance, Product Care operates under the policy of a 'level playing field' requiring fees to be paid to the program for all obligated products sold in British Columbia. Product Care identifies such products by conducting store checks, through its member audit process and information received from other members. The following is the compliance process protocol followed by Product Care in recruiting brand owners of such products:

1. Notification by telephone and/or email advising of the regulatory obligation and inviting the brand owner to join Product Care within a 30 day period.
2. Two formal letters are sent to the brand owner noting the prior contact, referring to the regulatory obligation and advising the brand owner of Product Care's intention to notify the ministry for enforcement purposes if compliance is not demonstrated (which may be accomplished by joining Product Care Association) within a second 30 day period.
3. A formal letter is issued to the Ministry of Environment advising of the circumstances including the name of the brand owner, the product and location of place of sale, with the request to the Ministry of Environment to investigate and if appropriate conduct enforcement proceedings.

Enquiries: In addition, occasionally Product Care is contacted by consumers with questions relating to products accepted or not accepted by the programs. If these cases cannot be answered by the collection depot they are referred to Product Care staff who resolve the enquiry directly with the consumer.

Dispute Resolution Procedure

Contractors: Product Care contracts with all suppliers to its program using commercial agreements.

- **Collection depots:** All collection depots are contracted to the program using renewable agreements which provide for a cancellation by either party on 30 days notice.
- **Processing:** With Product Care deals with reputable downstream processors and has developed long term relationships. Any disputes arising from collection or processing contracts would be resolved using normal commercial legal procedures.

Other stakeholders: Any complaints received from the general public, or other stakeholders are first dealt with by Product Care staff. If the issue remains unresolved, the matter would be referred to the chairperson of the Product Care board of directors, and finally, if necessary, to the Product Care board of directors.

8. Section 2 Requirements:

The following is a table which lists the directors of Product Care and their sector affiliation:

Product Care Board of Directors 2006-7				
<u>Name</u>	<u>Member</u>	<u>Term</u>	<u>Sector</u>	<u>Province</u>
Owen MacRae, Chair	KG Packaging	2008	Paint	BC
Wink Vogel	Cloverdale Paint	2008	Flammable Liquids	BC
Grant Mills	Mills Paint	2008	Paint	BC
Susan Peterson	ICI Paints	2008	Paint	Ont
Chris McCurdy	SC Johnson	2008	Pesticides	Ont
Doug Thiemann	Home Hardware	2007	Paint	Ont
Dick Glassford, Secretary	General Paint	2007	Paint	BC
Ted Stoner	CPPI	2007	Petroleum Products	Alberta
Paul Morgan, Vice Chair	Recochem	2007	Flammable Liquids	BC
Andrew Horsman	Wal-Mart	2007	Retail	Ont

Yours truly,



Mark Kurschner

Product Care Association

Public Consultation Meetings – 2006 Program Plan Refiling

Issues Summary

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

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

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

* * *



Product Care Association

British Columbia Product Stewardship Plan

for:

- **Paint category**
- **Solvent and flammable liquids category**
- **Pesticide category**
- **Gasoline category**

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October 2006



Product Care Association

British Columbia Product Stewardship Plan:

- Paint product category
- Solvent and flammable liquids product category
- Pesticides product category
- Gasoline product category

1. Regulatory Basis for this plan

This stewardship plan is filed by Product Care Association with the BC Ministry of Environment, pursuant to the requirements of Recycling Regulation B.C. Reg. 449/2004 (the "Regulation") for the following categories of residuals listed in Schedule 2 of the regulation:

- Paint
- Solvent and Flammable Liquids
- Pesticide
- Gasoline

This plan describes the current program as well as planning priorities for the next 5 year period **2006-2011** in the context of the approval criteria set forth in the Regulation,

2. Overview of existing programs:

Product Care Association was formed in 2001 as the result of the merger of the BC Paint and Product Care Association and the Consumer Product Care Associations. Paint stewardship was originally introduced in British Columbia in 1994, and the regulation requiring stewardship for the other residuals in Product Care's programs, in 1997. Product Care is a federal not for profit corporation governed by a multi sector industry board of directors.

Product Care's members are the manufacturers, distributors and retailers of products which are the subject of the Product Care programs. Product Care's members remit eco-fees to Product Care based on product type and container size for the paint, flammable and pesticide categories. Product Care operates a collection depot network across BC of Paint Depots and Paint Plus Depots which collect paint, flammable liquids, pesticides and gasoline.

Post-consumer leftover residuals received at the Product Care depots are transported to Product Care's central processing facility in Surrey, BC. At the processing facility, the product containers are sorted and emptied into shipping containers. The bulked residuals are then transported to a variety of destinations for reuse, recycling or other product management options.

Product Care also conducts a communication and education program to ensure consumer awareness of the program, as well as proper handling of program products.

3. Collection system – access and dispute resolution [Section 5 (1) (c) (iii) and (vi)]

Product Care currently operates 103 permanent year-round collection depots in British Columbia: 61 Paint Depots which collect leftover paint, and 42 Paint Plus depots which also collect flammables, pesticides and gasoline. There is at least one Paint Plus depot in each Regional District of BC. There is no charge to drop off program products. A complete list of depots is available at the Product Care website: www.productcare.org.

Product Care does not directly own or manage any depots but contracts with existing collection sites. Typically Product Care depots are co-located at facilities such as local government recycling centres or transfer stations, at beverage container depots or at other associations or businesses.

Products are collected at depots using a modular reusable covered bin system supplied by Product Care to the depots. In the case of flammables, pesticides and gasoline, the bins are housed in a secondary containment system for added environmental protection and fire safety. This consists of a walk-in concrete room which includes safety systems such as fire detectors, door release mechanism and ventilation. The size and expense of this secondary containment system has been one of the limiting factors. Recently Product Care has developed a steel “over-bin” which meets safety requirements and is suitable for outside applications.

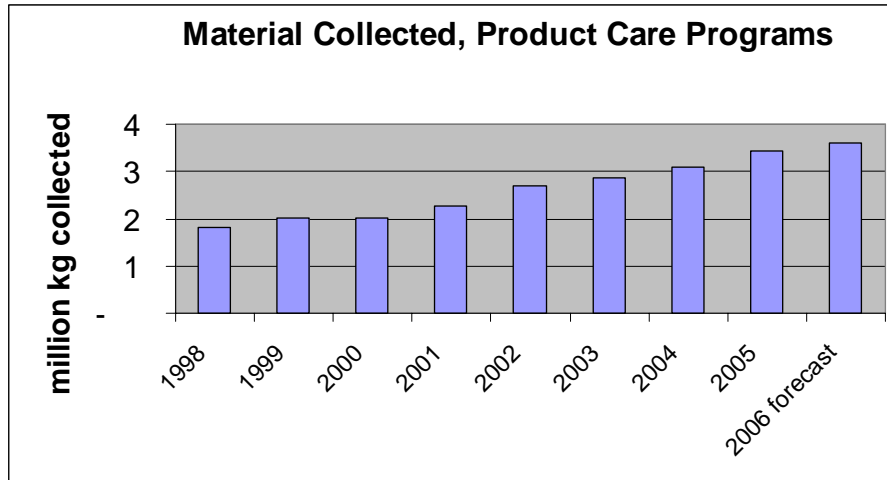
Product Care also supplements the depot collection system with a number of one-day events, often in participation with a municipality or regional district.

Dispute Resolution Process. Product Care contracts with all suppliers to its program using commercial agreements. All collection depots are contracted to the program using renewable agreements which provide for a cancellation by either party on 30 days notice. Any disputes arising from collection or processing contracts would be resolved using normal commercial legal procedures.

2006-2011: Product Care intends to increase the number of depots overall, and increase the number of Paint Plus Depots (which may be an expansion of service from an existing Paint Depot to a Paint Plus Depot), supplemented as necessary by collection events. This will be an ongoing process and will depend on local need for depot service and availability of suitable sites and partners. The program will focus on the specific locations raised during the consultation process.

4. Management of Collected Materials [Section 5 (1) (c) (viii)]

The following chart indicates quantity of residuals and containers recovered by the program over the past 9 years:



Consolidation and Bulking: Leftover products which have been received at depots are transported in reusable bins to consolidation points in different parts of the province. Full trailer loads are then shipped to the Product Care processing facility in Surrey, BC. At the processing facility, consumer containers are inspected, sorted, emptied and the contents are bulked in drums or other shipping containers.

This table provides a breakdown of liquid volume collected by product category in the year 2005:

2005	Paint (non aerosol)	Paint Aerosol	Flammable Liquids/Gasoline.	Pesticides
Recovery (litres)	2,164,042	17,360	54,386	7,656

Product Management: Product Care endeavours to manage collected products in accordance with the “pollution prevention hierarchy”.

A. Paint

- **Reuse** – Product Care conducts a “paint exchange” program by which better quality, fuller cans of paint are made available to consumers at no charge. Aerosol paints are not reused to avoid misuse for graffiti. Other products managed by Product Care are not suitable for give away due to safety and liability reasons. Some of the groups which utilize the paint exchange program are amateur theatre companies, farmers, charities, and homeowners. In the Greater Vancouver area, Product Care operates a paint exchange store at its main processing facility which is open five days a week during business hours. Outside of the Greater Vancouver area, paint exchanges are operated at participating depots.

- **Recycling** – Product Care utilizes a number of options for paint recycling including:
 - Reprocessing leftover latex and alkyd paint into paint and coatings products. The amount being reprocessed continues to increase as options become available to the program.
 - Latex paint as raw material incorporated in the manufacture of recycled concrete, and in the manufacture of Portland cement.
 - Extraction of solvents from alkyd paints. The recovered solvent is then used in other processes such as asphalt production.
- **Energy Recovery** – due to the high solvent content of alkyd paints, alkyd paints are suitable for energy recovery.
- **Other Disposal** – no paint products are disposed of in the landfill or in any other way.

B. Flammables

Because the nature of flammable products, and the fact that many flammable products are intended as fuels to begin with, flammables are managed for energy recovery as alternative fuels in facilities which comply with all air quality regulations.

C. Pesticides

Due to the nature of pesticides, there is no reuse or recycling option available, and all pesticides are incinerated at high temperature government regulated incinerators.

D. Gasoline

Due to the nature of gasoline, which is intended to be used as a fuel, waste gasoline is managed as an alternative fuel.

E. Containers

See discussion of Container Management below.

2006-2011: Product Care will continue to look for and utilize options which move volume “up” the pollution prevention hierarchy. In particular Product Care will seek to expand the “paint exchange” program at existing depots and at other locations.

5. Collection of Containers [Section 5 (1) (c) (ii)]

In the Regulation, empty paint containers are specifically included in the paint residual product categories definitions in Schedule 2. Accordingly the Product Care Paint Program accepts containers which contain leftover paint, as well as empty paint containers. With regard to the flammables, pesticides, and gasoline categories, the program accepts containers which hold residual quantities of those products but not already empty containers.

In 2005, 729 tonnes of metal and 75 tonnes of plastic containers were recycled. The following table summarizes the current container recycling options utilized by the Product Care program.

Product	Container type	Management method
Paint	metal paint containers	emptied, baled, dried and recycled as scrap metal
	5 gallon plastic pails (#2 HDPE plastic)	dried, handles removed, shredded, recycled into plastic
	black plastic (#5 polypropylene)	energy recovery
	aerosols	after paint and propellant are recovered, recycled as scrap metal
Flammable	metal	for many types of flammables such as solvents and thinners and fuels, the empty container is recycled as scrap metal.
	plastic (except #3 chlorinated plastics)	energy recovery
	other - #3 chlorinated plastics, tubes etc	items such as #3 chlorinated plastics and glue containers cannot be recycled and are disposed of as solid waste
Pesticide containers	all containers	triple rinsed as required and disposed as solid waste
Gasoline	metal or plastic	Once emptied, all plastic and metal gasoline containers are recycled. (see "Gasoline Containers" below)

Note that empty container recycling options vary with market conditions, for example poor past prices for scrap steel resulted in landfilling of empty steel paint containers.

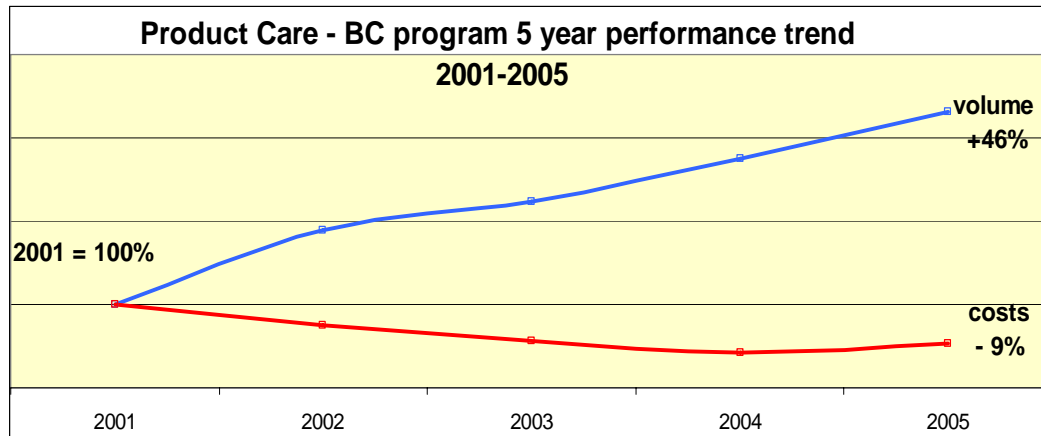
For many consumers, other local options exist for container recycling, for example dry empty metal paint containers can usually be recycled with other scrap metal. In other jurisdictions, consumers have the convenience of placing empty containers in the blue box system.

Gasoline containers: for safety reasons, the program requires waste gasoline to be left at the collection depot in approved ULC containers and the containers are not returned to the consumer. Consumers can obtain a \$6 reimbursement from Product Care to cover the cost of a new container, up to maximum of three claims per person per year.

2006-2011: Product Care will continue its efforts to identify local alternatives for container recycling which will reduce program cost and transportation requirements, as well as improved options for container recycling which are higher on the pollution prevention hierarchy.

6. Program Performance - Management of Program Costs and Environmental Impacts [Section 5 (1) (c) (i) and (v)]

The following chart shows the Product Care program trends for volume of material recovered, compared to total program costs.



During the five year period 2001 to 2005, the volume of material recovered by the program increased by 46% and the total cost of the program decreased by 9%. The decrease in program costs, despite the increase in volume can be attributed mainly to improved program administrative efficiencies and the identification of additional product management methods and vendors. Product Care conducts a regular analysis of costs by product sector to determine if eco fee adjustments are required.

Product Care pays all of the costs of collecting leftover products (including historic products i.e. products sold before the programs began for which no eco fee has been collected) and of managing the products collected. This cost is funded by eco fees paid to Product Care by its members. For many but not all products the eco fee is recovered at the time of retail sale as a separate charge. Eco fee rates are established by the allocation of the costs of managing different product types and container sizes. Eco fee rates are listed on the Product Care website www.productcare.org.

The eco fees charged on products in the Product Care program have never been increased, and have been decreased on several occasions. Product Care’s audited annual financial statements are available on its website www.productcare.org.

Risk Management / Reserve Fund: The primary basis for the inclusion of the residual products in the Regulation is to reduce environmental risk due to the hazardous nature of these products. Product Care reduces environmental risk arising from product management using a number of methods including commercially available environmental insurance and a reserve fund. Product Care has accrued a reserve fund which is limited to the amount which is two times annual program revenue. The reserve fund serves a number of purposes. The primary purpose is as a reserve in case of environmental claims. The fund also allows for

stability of program funding in case of volume increases, fluctuations in operational costs or reduced revenue.

2006-2011: Product Care will continue in its efforts to improve both environmental effectiveness and cost efficiency of the program. One tool is to identify potential synergies with other programs for collection, transportation and consumer awareness.

7. **Consumer Awareness** [Section 5 (1) (c) (iv)]

The Regulation requires that the plan makes adequate provision for “making consumers aware of (A) the producer’s product stewardship program, (B) the location of collection facilities, and (C) how to manage products in a safe manner.

Product Care uses a number of methods of creating consumer awareness of the program including the location of the collection sites, and information regarding product handling. These include:

- **Website** - www.productcare.org (also the websites paintrecycling.com and paintrecycling.ca redirect to the Product Care website)
- **Point of sale** – consumer brochures are distributed to over 4000 retailers in B.C., as well as program posters in different sizes, at no cost. The brochures are redesigned and distributed to all retailers at least every two years, and are distributed to retailers upon request at any time. Product Care is also testing a paint container sticker which the retailer places on the container at the time of sale. The sticker will inform the consumer how to access the program by referring to the program hotline and website.
- **Municipal partnerships** – Product Care offers brochures at no cost to municipalities for distribution with municipal mailings. Product Care participates in municipal calendars by advertising Product Care’s program information. Product Care has participated in a number of community recycling events and promotions.
- **Recycling Hotline** 1 800 667 4321 or 604 RECYCLE– Product Care is a long time participant in the RCBC recycling hotline service by which consumers can contact RCBC operators during business hours 6 days a week (Monday through Saturday, 9 am to 4 pm) and obtain information about disposing of Product Care program products as well as any other products.
- **Point of Return** – all participating Product Care depots display program signage and maintain a supply of consumer brochures
- **Trade Painters** – trade painters are significant consumers of paint and flammable (solvent and paint thinners) products. Dedicated mailings to trade painters and related associations (such as apartment owners) are conducted. In addition, a special trade painter direct drop off program has been promoted.

2006-2011: Product Care will substantially increase the communications element of its program, through existing channels as well as initiatives such as the following:

Market research study: Product Care will conduct a consumer market research survey to determine consumer awareness of the program and to gather other

information which may assist the program. The survey may include questions regarding:

- awareness of the program and methods utilized by consumer to obtain program information.
- awareness of and satisfaction with the collection system including desirable depot characteristics
- identification of target audiences, key messages and information channels for Product Care's communication program
- quantity of leftover residuals in respondent's household, and intentions regarding use or disposal.
- consumer perceptions regarding the level of eco fees in relation to the perceived environmental benefit.
- consumer's method of determining quantity of product required at time of purchase

Point of Sale: Product Care will focus on retailer awareness and participation. This will include the introduction of "recycle me" container stickers which are applied by the retailer to the container at the time of sale.

Municipal Partnerships: Product Care will continue to seek opportunities to partner with municipalities in informing householders of the availability of the program.

8. **Product Life Cycle Management** [Section 5 (1) (c) (vii)]

The Regulation refers to "...eliminating or reducing the environmental impacts of a product through the product's life cycle." Many of the products included in the Product Care programs have changed over time as a result of design for environment considerations. In particular:

- There has been a steady shift from oil based (alkyd) paints to water based latex paints with the result that currently in British Columbia approximately 70% of household paints sold are latex and the remaining 30% are oil based. It is expected that this trend will continue in the future with the market share of oil based paint continuing to drop as a consumer preference for latex paint increases and technical specifications improve. Federal regulations including regulations relating to the composition of surface coatings and for volatile organic compounds, is also hastening the process of reducing the environmental impact of paint products.
- There is a steady trend due to consumer preference, municipal bylaws restricting the use of pesticides, and federal regulatory requirements for producers to develop increasingly benign pest control products.

Tools used by Product Care Association which may have an impact on product life cycle include:

- Variable eco fees which increase with the size of the container
- Adjustment of product sector eco fees based on cost of managing the leftover product

- Consumer material including promotion of the “B.U.D.” rule, i.e. **B**uy what you need, **U**se what you buy and **D**ispose of the remainder responsibly.
- Research: Product Care is sponsoring a research project being conducted by the Engineering Department of the University of Western Ontario to determine the technical parameters and specifications for the use of leftover latex paint as a component of concrete manufacture.

2006-2011: Product Care will continue its participation with the Product Stewardship Institute <http://www.productstewardship.us/> which is examining a number of issues relating to paint stewardship including lifecycle analysis. Product Care will continue to interact with manufacturer associations such as Canadian Paint and Coatings Association to provide feedback to manufacturers regarding recyclability of both products and containers.

9. Recovery rate and targets: [s. 5(a)(i)(B) and s. 5 (a)(ii)]

The discussion of recovery rates and targets was major focus of the public consultation conducted by Product Care. A number of program performance measures and targets were considered. The challenges of setting appropriate recovery rates and targets for products that are intended to be consumed were well recognized. It was generally agreed that more than one performance criterion would need to be tracked.

2006-2011: Product Care will track and provide program performance measurement information as follows:

Product Recovered v Product Sold: Product Care will report litres sold and litres recovered for each product category on a year by year basis, and on a multi year rolling average basis to dampen any short term effects. The following table provides an example of single year data.

2005	Paint (non aerosol)	Paint Aerosol	Flammable Liquids/Gasoline.	Pesticides
Sales (litres) ¹	34,427,693	889,053	5,279,334 ²	125,735
Recovery (litres)	2,164,042 ³	17,360	54,386 ⁴	7,656
% recovery v sales	6.3%	2.0%	1.0%	6.1%

Notes:

1. “Sales (litres)” are calculated by converting the number of units reported sold using typical container volumes for each eco fee category.
2. flammables “Sales (litres)” figure does not include gasoline. Gasoline sector members do not report sales volumes to Product Care.
3. includes volume recovered via “paint exchange” program
4. represents combined flammable liquids and gasoline collection volumes

Historical comparison: Product Care will compile and present the Product Recovered v Product Sold data on a multi year basis in order to demonstrate trends.

Waste audit participations: Despite the small sample sizes of HHW in waste audits, data from a number of waste audits may provide useful information. Product Care will participate in a number of waste audits in partnership with local governments and compare results in order to determine if the data does present meaningful information.

Consumer awareness: Product Care proposes to conduct a consumer awareness survey within 12 months of the date of this plan, as part of its communication program which will be repeated periodically. The survey will measure level of consumer awareness and gather valuable information to improve the program.

10. Satisfactory consultation with stakeholders [Section 5 (1) (b)]

Product Care conducted a stakeholder consultation process in September 2006 as a prerequisite to the filing of this plan. The consultation included:

- Web based consultation using Product Care website www.productcare.org
- Email communication to stakeholders
- Regional consultations held in 4 regions: Lower Mainland, Vancouver Island (meetings), Southern Interior and Northern BC (telephone conference calls)
- Written submission provided by stakeholders

* * *

Submitted by
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