



Reference: 333879

November 20, 2018

Mark Kurschner
Product Care Association of Canada
105 West 3rd Ave
Vancouver, BC V5Y 1E6

Dear Mark Kurschner:

Thank you for submitting proposed amendments to the British Columbia Paint and Household Hazardous Waste Stewardship Plan (the “amendments”) in fulfillment of the requirements of section 6 of the [Recycling Regulation](#) (the “regulation”) made under the *Environmental Management Act*. I appreciate the industry’s continued commitment to achieving compliance in this regard.

Under the regulation, the director has the ability to both amend an approved extended producer responsibility (EPR) plan on his own initiative, and to approve amendments to an approved plan that have been proposed by a producer. I have completed my review of, and approve, the amendments proposed by the Product Care Association of Canada (PCA) on August 31, 2018.

PCA was provided with my draft decision letter dated August 7, 2018 and the opportunity to propose further amendments or provide additional information for consideration. PCA addressed several of the identified deficiencies, however one remains outstanding. Therefore, in addition to the amendments proposed by PCA, and approved by me in this letter, I am further amending the plan, pursuant to section 5(5) of the regulation.

By December 31, 2019, PCA will:

- 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](#);
- Submit to the director a stakeholder consultation summary document; and
- Propose amendments to the plan that address regulatory requirements and outcomes of the consultations.

The above additional amendments form part of PCA’s plan and take effect on November 20, 2018.

The requirement to undertake additional stakeholder consultation is common among other plans and plan amendments. Acknowledging the time and effort required on the part of stakeholders to provide meaningful input and feedback, PCA is encouraged to coordinate with other EPR programs when engaging stakeholders. Proposed amendments to the PCA plan will be in the form of a revised plan submitted to the director, including the stakeholder consultation summary document. PCA will also provide the director with a document that clearly highlights all proposed revisions to the plan.

These additional amendments are required to ensure the plan adequately provides for the elements set out in subsections 5(1)(b), (c)(i) and (vi) of the regulation. Specifically, I must be satisfied of the following:

- The producer has undertaken satisfactory consultation with stakeholders prior to submitting the plan for approval and will provide opportunity for stakeholder input in the implementation and operation of the extended producer responsibility program;
- The plan adequately provides for the producer collecting and paying the costs of collecting and managing products within the product category covered by the plan, whether the products are currently or previously used in a commercial enterprise, sold, offered for sale or distributed in British Columbia; and
- The plan adequately provides for a dispute resolution procedure for disputes that arise between a producer and person providing services related to the collection and management of the product during implementation of the plan or operation of the extended producer responsibility program.

Pursuant to section 6 of the regulation and based on the plan's original approval date of July 16, 2007, PCA's next plan review must be completed by July 16, 2022. However, a director under the *Environmental Management Act* may amend the approved plan pursuant to section 5(5) of the regulation or rescind approval of the approved plan pursuant to section 6.1 of the regulation, should PCA fail to meet the commitments set out in the approved plan. Please also note that failure to comply with an approved plan may result in the imposition of an administrative monetary penalty of up to \$40,000 or a fine of up to \$200,000.

Future plans and amendments

The ministry expects continuous improvement across all future plans and amendments including the following areas of concern:

1. Plan commitments – for example, use specific and measurable language;
2. Consumer access – for example, develop comprehensive province-wide accessibility – particularly in rural areas, or improve upon the current Stewardship Agencies of B.C. accessibility standard;
3. Consumer awareness - for example, include performance requirements tailored for different consumer groups and all product types managed by the program;
4. Financial transparency – for example, provide greater levels of disclosure in financial statements to better serve interests of producers, the ministry, and other stakeholders; and
5. Pollution prevention hierarchy – for example, highlight program areas of influence.

I acknowledge that some plans better address various concerns than others, and that collaboration between some producers/appointed agencies and the ministry is underway. As well, the ministry intends to develop further guidance on select areas of concern.

Related to the above concerns, but beyond my approval in this letter, I note the following opportunities for continuous improvement specific to PCA:

1. Reviewing and improving upon the current levels of disclosure offered in financial statements in order to provide greater financial granularity/transparency; and
2. Considering implementing differential fees for handling of program products based on environmental risks and true cost of end-of-life management e.g. recyclability. This is intended to further influence better Design for Environment in accordance with the pollution prevention hierarchy.

Additionally, with respect to empty product containers for the solvent and flammable liquids, pesticide and gasoline product categories, please note that, as the ministry has communicated, the intent of the regulation is to capture consumer packaging regardless of residual product content. The ministry intends to address this issue as soon as the opportunity arises.

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 in accordance with the document entitled, “Third Party Assurance Requirements for Non-Financial Information in Annual Reports” dated October 2018 and revised from time to time, which is enclosed.

Finally, the ministry expects this approval letter to be forwarded to PCA’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.

I look forward to working with you to ensure the success of your program. If you have any questions about this letter, please contact me at 778 698-4860 or ExtendedProducerResponsibility@gov.bc.ca. If you have any questions regarding the implementation of your plan, or suggested opportunities for improvement, please contact your ministry file lead.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bob McDonald', with a stylized flourish at the end.

Bob McDonald
Director, Extended Producer Responsibility Section
Environmental Standards Branch

Enclosure (2)

cc: Kris Ord, Executive Director, Environmental Standards Branch
Hanna Vovk, Ministry file lead, Extended Producer Responsibility Section



British Columbia Paint and Household Hazardous Waste Stewardship Plan

For the following product categories listed in Schedule 2 of the BC Recycling Regulation:

- Paint
- Solvents and Flammable Liquids
- Pesticides
- Gasoline

For submission to:

Bob McDonald
Director, Extended Producer Responsibility
Environmental Standards Branch
BC Ministry of Environment
3rd Floor - 2975 Jutland
Victoria BC V8W 9M1
250-387-3588

For more information:

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Revised and Submitted August 31, 2018

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GLOSSARY

The following is a glossary of terms and abbreviations used in this program plan.

Term	Definition
Stewardship Plan	Paint and Household Hazardous Waste Stewardship Plan
Regulation	<i>BC Recycling Regulation</i> , BC Reg. 449/2004, as amended B.C. Reg. 88/2014, May 23, 2014
Program	Paint and Household Hazardous Waste Stewardship Program

Acronym	Initial phrase
CCV	Container capacity volume
CWMA	Coast Waste Management Association
EHF	Environmental handling fee
ELC	Equivalent litres of containers
EPR	Extended producer responsibility
HHW	Household hazardous waste
PCA	Product Care Association
PCB	Polychlorinated biphenyls
PCP	Pest control product
PPH	Pollution prevention hierarchy
RRV	Residual recovery volume
SABC	Stewardship Agencies of British Columbia
VOC	Volatile organic compound

1 INTRODUCTION

The BC Paint and Household Hazardous Waste Stewardship Program (“Program”) is an approved stewardship program operated and managed by Product Care Association of Canada (“PCA”) since 1995.

This revised Paint and Household Hazardous Waste Stewardship Plan (“Stewardship Plan”) is submitted to the British Columbia Ministry of Environment and Climate Change Strategy (“Ministry”) by Product Care Association of Canada (“PCA”) on behalf of the major brand owners of paint and household hazardous products sold in British Columbia, pursuant to the requirements of the [BC Recycling Regulation](#) (“Regulation”)¹. The Regulation requires Stewardship Plans to be reviewed and submitted to the Ministry for approval every five years. PCA submitted a revised Stewardship Plan to the Ministry for approval on March 15, 2018. PCA received a letter on August 7, 2018 from the Ministry identifying some areas that require further amendments. This Stewardship Plan has been revised to address areas that have been identified and replaces the previous stewardship plan developed and implemented by PCA on 2012 and the earlier stewardship plan approved by the Ministry in 2006.

The Program has been in operation since 1994 for paint and 1997 for Household Hazardous Waste (HHW)².

A number of changes and improvements have been made to the Stewardship Plan over the 2012 Plan. The Stewardship Plan introduces a decision tree for to assist with the classification of solvent and flammable liquids (see Appendix A). The plan provides more detail on management options for the various product categories and sets management targets for all product categories and their containers, whereas the 2012 Plan only provided targets for select product categories (see sections 9 and 11). The Stewardship Plan maintains reporting commitments for collection volumes of the various product categories (see Section 6), but removes collection volume and recovery rate targets due to the questionable value of these metrics. The Stewardship Plan also introduces reporting commitments and targets for waste composition audits. Finally, the Stewardship Plan describes targeted strategies to increase consumer awareness.

2 DUTY OF PRODUCER

For reference, 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 [Product Stewardship Plans] and comply with the approved plan, or*
- (b) comply with Part 3 [Product Stewardship Program Requirements If No Product Stewardship 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

¹ British Columbia Ministry of Environment, *BC Recycling Regulation*, BC Reg. 449/2004, as amended B.C. Reg. 88/2014, May 23, 2014. Accessed at http://www.bclaws.ca/civix/document/id/complete/statreg/449_2004.

² For the purposes of this Stewardship Plan, household hazardous waste means pesticides, gasoline, solvent and flammable liquids.

The Regulation defines a “Producer” as:

- (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)...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,*
- (iii)...a person who imports the product into British Columbia for sale, distribution or use in a commercial enterprise.*

The BC Recycling Regulation Guide makes further reference to the definition as “... 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”.³

3 APPOINTMENT OF A STEWARDSHIP AGENCY

The Program is developed, managed and operated by PCA, a not-for-profit industry association that manages product stewardship programs for paint, household hazardous and special waste on behalf of its members across Canada. PCA was established as an agency to allow its members (obligated Producers) to meet their obligations under applicable extended producer responsibility legislation. PCA is incorporated under the *Canada Not-for-Profit Corporations Act*⁴ and is governed by a multi-sectoral industry board of directors, with representation from four membership classes (Paint Products, Lighting and Alarms Products, Retail and Other Products). Any changes to PCA’s corporate status will be referenced in the Program’s annual report, if applicable. The Paint Product sector is represented on the PCA board by paint manufacturers and retailers. The Other Product sector is represented by manufacturers and retailers of pesticides and solvents/flammable liquids. A current list of PCA’s Board of Directors is available on PCA’s website (productcare.org).

The Program is also supported by PCA’s National Household Hazardous Waste Advisory Committee comprised of industry representatives from HHW product and business sectors (manufacturers, retailers, trade associations). Established in 2016, the Committee deals mainly with technical matters, such as product definitions.

According to section 2 of the Regulation, a Producer must either comply with Part 2 or Part 3 of the Regulation in order to sell, offer for sale, distribute or use in a commercial enterprise in BC. Accordingly, each Producer that joins the Program appoints PCA as its agent to carry out the duties of the Producer imposed by section 2(2) of the Regulation. In turn, the Stewardship Plan confirms the duties that PCA will perform on behalf of each Producer that is a member of the Program. Confirmation of membership is available upon the request to the Director.

³ British Columbia Ministry of Environment, *Recycling Regulation Guide*, April 2012.
http://www2.gov.bc.ca/assets/gov/environment/waste-management/recycling/recycle/recycle_reg_guide2012.pdf.

⁴ A copy of the Act is available at <http://laws.justice.gc.ca/eng/acts/c-7.75/>. PCA’s Letter of Continuance, bylaws and current financials are available on PCA’s website www.productcare.org.

The Program is the only approved stewardship program for paint and household hazardous waste in the Province. Program membership is open to all obligated Producers, including manufacturers, brand owners, distributors, first importers and retailers of obligated products in BC. To the best of the knowledge of PCA, PCA members represent the vast majority of the markets in British Columbia for paint and household hazardous waste products. PCA is continuously engaged in identifying and recruiting obligated Producers of Program Products in the BC market, and where necessary, notifying the Ministry for follow up and enforcement. A current list of Program members, as well as other member-related information, is available on PCA's website, www.productcare.org.

PCA also manages and operates paint stewardship programs in other provinces: SK, MB, ON, NB, NS, PEI and NL and for HHW in MB and ON.

4 PRODUCTS COVERED UNDER THE STEWARDSHIP PLAN

At the time of this Program Plan submission, the Program covers all products captured under the categories of paint, pesticides, solvent and flammable liquids and gasoline in Schedule 2 of the Regulation and provides additional clarity with regard to specific products included. There have been no changes to the scope of products accepted by the Program since submission of the previous program plan in 2012.

The following section details the scope of products included and excluded from the Program, along with a non-exhaustive list of examples. Following discussions with stakeholders, information regarding criteria for product inclusion has been amended to make it clearer for program members and other stakeholders to determine whether specific products are included under the category of solvents and flammables. In addition, a decision tree has also been developed to assist in the classification of solvents and flammable liquids (see Appendix A). A detailed and updated list of all products accepted by the Program ("Program Products") can be found on PCA's website, www.productcare.org.

In addition to the non-program products set out below, the following materials are not accepted by the Program:

- Bulging containers
- Unidentifiable or unlabelled containers
- Leaking or improperly sealed paint containers
- Lubricants, oils and antifreeze
- Other household chemicals

4.1 Paint Products

4.1.1 Paint Products Included in the Program

Section 2 of Schedule 9 of the Regulation defines paint products as:

(a) latex, oil and solvent-based architectural coatings, including paints and stains for commercial and household use, whether tinted or untinted, and including empty containers for any of these, and; (b) paints and stains, whether coloured or clear, sold in aerosol containers, and including empty aerosol

containers for any of these, but not including unpressurized coatings formulated for industrial, automotive or marine anti-fouling applications.

The Program accepts and manages the following types of paint (up to a maximum container size of 25 litres) and aerosol paint (up to maximum container size of 680 grams or 24 ounces).

Paint products accepted by the Program include, but are not limited to, the following list, which is subject to change by PCA:

- Interior and exterior water-based (e.g. latex, acrylic) and oil-based (e.g., alkyd, enamel) architectural paint
- Deck, porch and floor coating (including elastomeric)
- Varnish and urethane (single-component)
- Concrete and masonry paint
- Drywall paint
- Undercoats and primers (e.g. metal, wood, etc.)
- Stucco paint
- Marine paint⁵
- Wood finishing oil
- Melamine, metal and anti-rust paint, stain and shellac
- Swimming pool paint (single-component)
- Stain blocking paint
- Textured paint
- Block fillers and sealers
- Wood, masonry, driveway sealer or water repellent (non-tar based or bitumen based)
- Paint aerosols of all types including automotive, craft and industrial products

The program also manages the container in which the unwanted paint is contained, as well as “empty containers” (“a container that holds less than 3% residual by volume”) as specified in the definition of paint products under Section 9 of Schedule 2 of the Regulation.

4.1.2 Non-Program Paint Related Products

Paint-related products that are not accepted by the Program include, but are not limited to, the following:

- Industrial paint and finishes
- Paints or wood preservatives that are registered as a pesticide under the Pest Control Products Act (has a P.C.P Registration number on the label)⁶
- Non-Aerosol craft paint
- Non-Aerosol automotive paint

⁵ Unless registered under Pest Control Products Act, in which case they are evaluated under the domestic pesticide category (see section 4.2.1.2 below).

⁶ These products are considered under the domestic pesticides category (see section 4.2.1.2 below).

- Two-part or component paints containing a catalyst or activator
- Roofing products (i.e. patch, tar or repair)
- Tar or tar/bitumen-based products
- Traffic or line marking paint
- Resins, fibreglass
- Paint thinner, mineral spirits or solvents⁷
- Deck cleaners
- Colourants and tints
- Caulking compound, epoxies, glues or adhesives
- Nitro-cellulose based paints
- Brushes, rags and rollers
- Paint containers with poor integrity (e.g. badly rusted cans) or leaking

4.2 HHW Products

4.2.1 HHW Products Included in the Program

The Program collects and manages the following household hazardous waste products:

4.2.1.1 Solvent & Flammable Liquids

Section 2 of Schedule 2 of the Regulation defines “Solvent and Flammable Liquid” products as:

(a) products with a flash point as tested by the ASTM D1310 Tag Open Cup Test Method of less than 61°C with the exception of

- (i) products containing less than 50% water-miscible flammable liquid, as defined by the National Fire Code of Canada, 1990, as published by the National Research Council of Canada, by volume with the remainder of the product not being flammable,*
- (ii) liquids that have no fire point as tested by the ASTM D1310 Tag Open Cup Test Method,*
- (iii) wine and distilled spirit beverages,*
- (iv) cosmetic and beauty products,*
- (v) drugs, medicines and other health products,*
- (vi) unpackaged products or products not ordinarily sold to, used or purchased by a consumer without repackaging,*
- (vii) pre-packaged products produced for use by commercial or industrial enterprises without resale to other consumers as pre-packaged goods,*
- (viii) products in the paint product category,*
- (ix) coatings formulated for industrial or automotive use, and (x) pre-packaged kerosene in containers larger than 9 litres, and (b) paint strippers containing methylene chloride.*

⁷ These products are considered under the solvent & flammable liquids category (see section 4.2.1.1 below).

The Program accepts and manages consumer solvent and flammable liquids with a flame symbol or phrase similar to "keep away from open spark or flame" on the label. Subject to a maximum container size of ten (10) litres.

The list of solvent and flammable liquid products accepted by the Program is subject to change by PCA. Examples include, but are not limited to:

- Acetone
- BBQ lighter fluid
- Camping fuel
- Fondue fuel
- Kerosene
- Flammable degreasers
- Flammable lubricants
- Flammable liquid adhesives
- Flammable fuel treatment and additives
- Methanol
- Methyl Hydrate
- Mineral spirits
- Paint stripper
- Paint thinner
- Paint and varnish remover
- Turpentine
- Varsol
- Flammable liquids in aerosol form
- Other flammable solvents

As noted previously, a Product Classification Decision Tree is provided in Appendix A to this Program Plan to assist members in classifying products under the solvent and flammable liquids category.

4.2.1.2 Domestic Pesticides

Section 3 of Schedule 2 of the Regulation defines "Domestic Pesticides" products as:

- (1) Subject to subsection (2), the pesticide product category consists of control products registered under the Pest Control Products Act (Canada) that*
- (a) are required to show on the label the domestic product class designation, and (b) display on the label the symbol shown in Schedule III of the Pest Control Products Regulation (Canada) for the signal word "**Poison**".*
- (2) The pesticide product category does not include the following:*
- (a) insect repellents;*
 - (b) sanitizers and disinfectants;*
 - (c) pet products;*

(d) unpackaged products or products not ordinarily sold to, used or purchased by a consumer without repackaging.

The Program captures domestic pesticides (liquids, solids and aerosols) that have the poison symbol (skull and crossbones contained in an octagon, diamond or "yield" shape) together with the words "danger - poison", "warning - poison" or "caution - poison" to the description, a Pest Control Product (PCP) number and the word "domestic" on the label, subject to a maximum container size for liquid and solid pesticides of ten (10) litres and a maximum size for aerosols of 680 grams or 24 ounces.

4.2.1.3 Gasoline

Section 4 of Schedule 2 of the Regulation defines "Gasoline" products as:

The gasoline product category consists of gasoline sold for use in spark ignition engines and returned in an approved Underwriters Laboratories of Canada container.

The Program, therefore, accepts waste gasoline only in approved ULC containers, subject to a maximum container size of 25 litres.

4.2.2 Non-Program HHW Related Products

HHW-related products that are not collected and managed by the Program include, but are not limited to, the following:

- Commercial, industrial or agricultural products (e.g. agricultural pesticides which are managed by CleanFarms)
- Cosmetics, health and beauty aids
- Diesel, propane, butane fuels
- Pesticides that do not meet the definition as set forth Section 4.1(c) of the Plan (those pesticides whose label does not bear the "DOMESTIC" classification in addition to the term "Danger", "Warning" or "Caution - Poison" and the "skull & crossbones" symbol.)
- Insect repellents, disinfectants and pet products
- Fertilizer
- Acids, cleaners, bleach, and other corrosive materials

The program also manages the container in which the unwanted HHW is contained, but does not accept "empty containers" ("a container that holds less than 3% residual by volume") which are not included in the definitions for solvent & flammable liquids, domestic pesticides and gasoline under Section 9 of Schedule 2 of the Regulation.

A regularly updated list of non-accepted household hazardous waste products can be found on PCA's website. PCA reserves the right to amend the list of non-Program Products at any time.

5 STAKEHOLDER CONSULTATION

As a prerequisite to the filing of this Stewardship Plan, the Program held four consultations on the Stewardship Plan. Before each consultation, reasonable notice was sent to the stakeholders whose interests could potentially be or are affected by the provisions of this Stewardship Plan. Specifically, notice was:

- Emailed to affected stakeholders, including service providers, regional governments, Indigenous communities, program members, and industry associations;
- Posted on PCA's service provider website (productcare.org) and consumer-facing website (regeneration.ca) under news/public consultation;
- Sent to the Recycling Council of British Columbia, Stewardship Agencies of British Columbia and Coast Waste Management Association for distribution to their membership and listserves.

PCA conducted three consultation sessions as part of the consultation process:

- In-person consultation on October 19, 2016 at the Coast Waste Management Association (CWMA) Conference in Victoria, BC. Notice of consultations was emailed directly to all interested stakeholders on October 3/4, 2016 and a second reminder notice sent on October 18, 2016. Industry associations, including CWMA, RCBC and the BC Product Stewardship Council, were asked to circulate the notice to their members and include information about their consultations in their newsletters.
- Conference call and webinar with members of the BC Product Stewardship Council was held on March 14, 2017.
- Two public webinar consultations were held on March 16 and 30, 2017. Notice was posted on productcare.org on March 9, 2017 and sent via email to all interested stakeholders on March 10, 2017, with additional reminder notices distributed on March 13 and 23, respectively. Presentation materials were distributed to all consultation participants on April 5, 2017 following the consultations.

A list of the 56 participants who attended the consultations and their affiliations, where provided, is provided in Appendix B. During each consultation, stakeholders had the opportunity to ask questions about the draft Stewardship Plan, including Program commitments and targets. The deadline for written stakeholder feedback was April 14, 2017. In total, 71 comments/questions were received during the consultations from the various stakeholder groups: local government (45%), industry (23%), service providers (21%), not-for-profit organizations (6%), Indigenous communities (4%) and other (1%). All comments and questions received are listed in Appendix C along with PCA's responses, and each was taken into consideration by PCA in preparing the Stewardship Plan. The topics receiving the greatest number of comments from stakeholders were clarification of product definitions and the scope of included products (17%), as well as requests to expand the scope of included products in the Program (10%). The updated Program Plan, including comments and responses, was posted on www.productcare.org on July 7, 2017 for review by stakeholders prior to submission to the Ministry on July 15, 2017 and all stakeholders, including those who provided comment during the formal consultations, were informed by email. No further comments were received.

PCA also consults with stakeholders on an ongoing basis regarding the program’s operation by:

- Visiting collection sites on a regular basis
- Engaging with program members through regular interaction by telephone, email and through the PCA website
- Consulting with National HHW Advisory Committee members

6 COLLECTION SYSTEM AND CONSUMER ACCESSIBILITY

6.1 Collection system

Since the Program’s inception in 1994, PCA has established a comprehensive collection system of permanent year-round collection sites across BC that provides reasonable access to consumers. The permanent collection site system is comprised of two types of collection sites:

Paint collection sites	Collect leftover paint and paint aerosols only
PaintPlus collection sites	Collect leftover paint, paint aerosols and HHW

As of December 31, 2016, the Program operated 219 permanent, year-round collection sites in British Columbia. Of this total, 115 were Paint collection sites and 104 were PaintPlus collection sites. PaintPlus collection sites are much more difficult to establish compared to Paint collection sites, due to regulatory requirements relating to handling HHW, as well as other factors. As of the end of 2016, 43 of 115 Paint collection sites are retail stores, however, to date, the retailer sector has not participated in collection of HHW.

There is no charge to drop off Program Products at any collection site, whether the products are currently or previously sold, offered for sale or distributed in BC. Additionally, the Program provides an online collection site finder on PCA’s Regeneration website to assist consumers in locating their closest collection site.

PCA does not directly own or manage any collection sites, but contracts with existing collection sites. Collection sites include, but are not limited to:

- Local government facilities such as recycling centres, transfer stations or landfills
- Bottle depots
- Non-profit organizations
- Private businesses
- Return to retail
- Indigenous communities

The Program has been successful in establishing collection sites in a number of Indigenous communities, including Bella Bella, Lax Kw’alaams, Tsal’alh and the Mt. Currie Indian Band. PCA will continue to have discussions with those Indigenous communities who are ready, interested and in a position to discuss the possibility and best service options for their community. In general, PCA aims to provide a “one-stop shop”

collection service for consumers by collaborating with other stewardship programs to co-locate collection services in the same location.

Collection Events

PCA also augments the permanent collection system with a number of one day collection events, often initiated by and held in collaboration with a municipality, regional district or local communities. The number of events held each year varies depending on the number of requests received from local government and the number of collection site gaps that need to be addressed at the time. Local governments/communities generally host the events. The Program partners with the event organizers to supply collection containers and takes responsibility for the transportation and recycling of the collected Program Products.

In addition, for those who qualify, the Program offers a free, direct pick-up service for businesses and entities that generate large volumes of Program Product.

Performance Metrics

The Program will maintain a minimum of 219 contracted Paint or PaintPlus collection sites. The number and location of contracted Paint collection sites and Paint Plus collection sites, as well as one day events, will be published annually in the Program's annual report by municipality and by regional district. Unless otherwise indicated, all performance requirements, commitments and targets apply to the first full five calendar years following plan approval. Following that period, the Program will continue to maintain and report on these commitments until they have been reassessed. See also performance metrics under section 6.2 (accessibility).

6.2 Accessibility

The Program has a mature and well-established collection system that provides consumers access to collection facilities in accordance with the Stewardship Agencies of BC (SABC) Accessibility Standard. The Standard defines reasonable access as a 30 minute drive to a collection site in urban areas of population greater than 4,000, and a 45 minute drive to a collection site in rural areas with a population greater than 4,000. 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 SABC Accessibility Standard is utilized to assist in defining "reasonable" access to collection facilities, as required by the Regulation. Recognizing that it is not possible or economically viable to have collection site coverage in all areas of the province, the Standard was established to ensure reasonable access to collection facilities for a high percentage of the province's population. The Standard's criteria were established based on the objective of serving the vast majority of the provincial population, including consideration of both rural and urban communities. Current criteria continue to accomplish that goal.

The standard is meant to be a minimum standard and the Program strives to provide collection services that exceed levels under the Standard. The Program augments the network of contracted collection facilities with direct pickup service province-wide for qualified commercial and large volume generators

paint. Where gap areas exist in the network⁸, the Program seeks opportunities to establish a permanent collection site or provide collection services through events or other viable options, and in partnership with other stewardship agencies whenever possible. PCA continues to work with authorities in smaller communities, including Indigenous communities, to evaluate the possibility of providing collection services (see discussion regarding Indigenous communities in section 6.1 above).

To measure accessibility levels, PCA retains the services of a reputable, independent third-party consultant. The network is analysed by collection site type, applying widely accepted GIS practices. As of the end of 2016, the Program had established a comprehensive network of 115 Paint collection sites and 104 Paint Plus sites. The accessibility rate for the 104 Paint Plus sites, all of which accept both paint and HHW (PaintPlus) meets the 95% rate according to the SABC Accessibility Standard. Accordingly, the additional 115 Paint collection sites further exceed the 95% accessibility rate for paint. The collection system coverage has been consistent over the past years and PCA continues to seek opportunities for expansion.

In addition to the program's network of permanent collection sites, the Program participates in a number of one-time collection events generally organized by a municipality, regional district or local communities. Collection events generally accept all program products, however the exact scope of products accepted is determined by the hosting local government. These collection events as well as large volume direct pickup services provide additional access for consumers and generators but are not included in calculating the program's accessibility rates.

Performance Metrics

With reference to the SABC Accessibility Standard, the Program will maintain a minimum accessibility rate of 95% for paint (through Paint and Paint Plus collection sites) and for HHW (through PaintPlus collection sites only). An accessibility study will be conducted every five years (next study by end of 2021), at which time the Program will evaluate its collection system to ensure accessibility rates have not materially changed over the duration of the Program Plan. Unless otherwise indicated, all performance requirements, commitments and targets apply to the first full five calendar years following plan approval. Following that period, the Program will continue to meet or exceed this accessibility target and report against this target until it has been reassessed.

6.3 End of life management

The objective of the Program is to minimize the improper disposal of Program Products by providing an effective collection program and ensuring that the collected materials are either reused or recycled or disposed of in an environmentally responsible manner. The Program encourages consumers buy the right amount, use up the products they buy and to dispose their unwanted Program Products (the "B.U.D. Rule") through the Program, rather than disposing of them improperly in the garbage or directly into the environment. In addition to the Program, consumers or end users may contract with hazardous waste management companies to dispose of their unwanted products. The Program strives to manage collected Program Products using the highest option on the pollution prevention hierarchy as set out under section

⁸ "Gap areas" means areas that meet the SABC Standard's definition of accessibility, but do not have access to a permanent collection site.

5(1)(c)(v) of the Regulation. The application of the pollution prevention hierarchy and the management of each product varies depending on a number of factors, such as availability of appropriate recycling technologies, qualified service providers, and operational costs related transportation and management of the materials.

Waste composition audits

To confirm that Program Product is being successfully diverted from landfill, the Program participates in waste composition audits undertaken by local governments in collaboration with other stewardship organizations.

Performance Metrics

The Program commits to participating in all waste composition studies committed to by SABC. The Program will report out on the number and location of waste composition audits conducted annually and the amount of Program Product identified, as applicable. Unless otherwise indicated, all performance requirements, commitments and targets apply to the first full five calendar years following plan approval. Following that period, the Program will continue to report against this commitment until it has been reassessed.

6.4 Volume Collected

Reference to volumes of residuals collected as a measure of Program performance presents some unique challenges in the context of paint and HHW products. Unlike some other stewarded products, such as tires, pharmaceuticals and electronics, Program Products are consumable products that do not necessarily have an expiry date after which they are no longer usable. Rather, consumers may keep Program Products in their possession for years after initial use. Program Product is only considered waste at the point where the consumer no longer values it or has any use for it. Factors such as the consumable nature of the product, varied product life expectancy, and consumer behavior make it difficult to evaluate program performance based on collected volumes.

A jurisdictional scan of paint and HHW EPR programs show that programs typically measure amount collected either by weight or by volume. There are different approaches to measuring volumes collected.

One approach is to use the measure of residual recovery volume (RRV). RRV represents the actual quantity of residual paint (excluding containers) collected by the Program, measured in litres. Many factors unrelated to program performance may explain an increase or decrease in RRV over time, such as population change, consumer purchasing habits and housing market activity.

An alternative approach is to measure the volume of Program Product containers collected using “container capacity volume” (CCV), also known as “equivalent litres of containers” (ELC). CCV is the measure of the maximum capacity of containers, if they were full, returned through the Program. CCV values are extrapolated from the number of “tubskids” of Program Products managed by the Program. Tubskids are collection bins used to transport containers of Program Products from collection sites to processing facilities. In order to reduce the variability that can result from changes in external market conditions, CCV is used by the Program as the metric for collection quantity, and RRV is used to calculate the recovery rate.

There are different approaches to measuring volumes collected, each of which, in the context of consumable products like paint, has benefits and limitations as a measure of program performance. In general, the assessment of program performance for consumable products requires the analysis of a number of performance metrics. CCV is most commonly used by PCA programs in other jurisdictions to report on volume collected, and RRV is used in calculating recovery rates. Accordingly, the Program will report volumes collected based on CCV. The Program is not aware of any other collection performance measure utilized in a paint or HHW EPR program, other than recovery rate, volume or weight.

Table 1 below reports the CCV of program products collected by the Program from 2010 to 2016.

Table 1: Container Capacity Volume (CCV) 2010 – 2016 (Litres)

	Paint		Solvent & Flammable Liquids		Pesticides	
	CCV	% Change Yr/Yr	CCV	% Change Yr/Yr	CCV	% Change Yr/Yr
2010	9,565,432		258,345	---	66,182	---
2011	9,810,636	2.56%	289,930	12.2%	69,638	5.2%
2012	10,004,088	1.97%	301,760	4.1%	75,902	9.0%
2013	10,169,458	1.65%	305,516	1.2%	70,286	-7.4%
2014	10,848,279	6.68%	344,010	12.6%	92,578	31.7%
2015	11,693,724	7.79%	377,111	9.6%	93,917	1.4%
2016	12,211,682	4.43%	424,527	12.6%	100,613	7.1%
Average	--	4.18%	--	8.72%	--	7.83%

As illustrated in Table 1, there is significant variation in volumes collected for both paint and HHW, due to some of the reasons outlined previously. As such, the Program commits to achieving an annual increase in CCV of 4.2% for paint, 8.75% for solvents & flammables and 7.85% for pesticides based on 2016 container capacity for total volumes of paint (including aerosols) and HHW reported, for the five calendar years following the approval date, recognizing that the targets are based on historic averages.

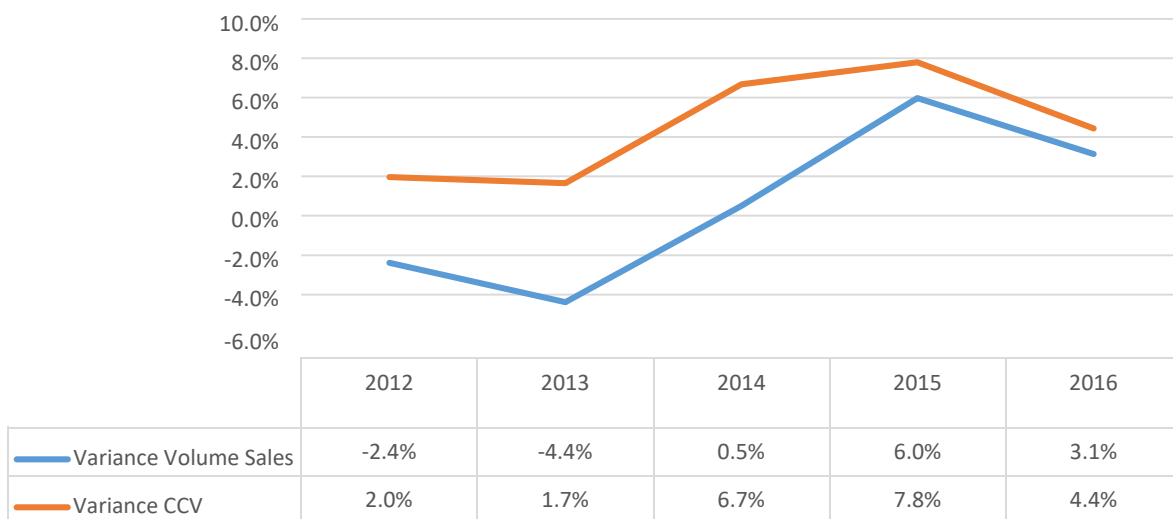
It should be noted there is no recognized benchmark for collection targets as the Program is not aware of any other paint or HHW programs that have collection volume targets. The proposed rate of annual CCV increase represents a reasonable rate of increase based on historic variances, sales trends, maturity of the Program and the assumption that the collection network will remain relatively stable in the coming years and is also takes into account the following considerations:

- Paint sales: As illustrated in Figure 1 below, historical variances in paint sales have tracked closely with CCV. Similarly, Figure 2 illustrates the relationship between the rate of change in housing starts and paint CCV. Historic sales for the paint industry have been relatively flat for the past several years. Sales in 2014 and 2015 were stronger, however this is attributed to a number of factors, including a jump in housing starts and expansion of the Program’s collection network (see below), which are not anticipated to be sustained in future years. Industry anticipates that future

growth in paint sales will be very modest, tracking closer to rates in 2011-2013. Similarly, CMHC is forecasting a decline in building starts in 2018 and 2019.⁹

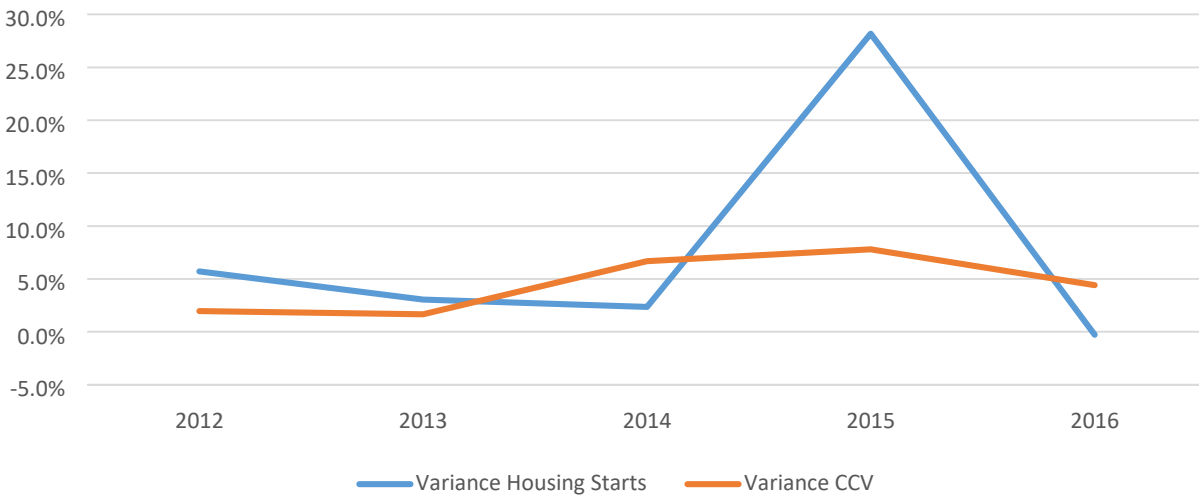
- **Building starts:** The number of building permits issued (housing starts) in BC increased in 2015 after consistent declines in previous years. As noted, the number of housing starts has been in decline since 2016.
- **Collection network:** The Program saw a significant expansion of its collection network by 15.1% in 2013 from 179 to 206 facilities, which may have contributed to the disproportionately large increase in CCV in 2014, however based on current information the potential for further expansion of the collection system is limited.
- **HHW Product Reformulation:** In response to regulatory requirements and consumer expectations, a significant number of products are being reformulated, especially for the solvent/flammables and pesticide categories, resulting in products that are no longer designated under the Recycling Regulation and reducing the quantity that is available to collect and the CCV.

Figure 1: Comparison of Historic Volume Sales and CCV



⁹ Canadian Mortgage and Housing Corporation, *Housing Market Outlook - British Columbia Regional Highlights* (Fall 2017). Available at https://www.cmhc-schl.gc.ca/odpub/esub/65442/65442_2017_B02.pdf?fr=1517004802397.

Figure 2: Comparison of Historic Building Starts and CCV



Residual recovery rate (RRV) compares the residual volume of product collected in a given year to the volume of product sold (in litres) in that same year:

$$\text{Residual Recovery Rate} = \frac{\text{Litres of paint collected}}{\text{Litres of paint sold}}$$

As explained above, RRV is used in calculating the recovery rate of the residual product. While RRV is an important indicator of program performance, it must be recognized that it is a ratio of two values, which can be influenced by different factors in a given year, such as market conditions and consumer purchasing behaviour. Despite a higher recovery volume and consumer awareness in a given year, the recovery rate can decline in comparison to the previous years if sales have increased at a higher rate. On the other hand, a decrease in the recovery rate may be a reflection of consumers using paint more efficiently. Again, it is important to look at trends over time in conjunction with other performance indicators.

While the program is committing to an annual increase in CCV, the program does not consider that recovery rates can continue to grow beyond current levels. The Program has already achieved higher recovery rates than any other paint stewardship program in Canada and the United States, and exceeds what some studies (see Section 7 – consumer awareness) have estimated is the percentage of paint sold that is recoverable.

According to Section 9 of Schedule 2 of the Regulation, the paint category consists of:

- (a) latex, oil and solvent-based architectural coatings, including paints and stains for commercial and household use, whether tinted or untinted, and including empty containers for any of these, and
- (b) paints and stains, whether coloured or clear, sold in aerosol containers, and including empty aerosol containers for any of these, but not including unpressurized coatings formulated for industrial, automotive or marine anti-fouling applications.

The residual paint is the component that poses the highest risk to the environment, if improperly managed by consumers. The main focus of the Program is to minimize the environmental impact associated with residual paint at end of life, because the residual, not the packaging, poses the immediate risk to the environment, when improperly managed. Landfill studies have shown that minimal paint containers end up at the landfill, evidencing that paint and paint containers are not being disposed improperly.

Studies indicate that consumers often keep empty containers to use for various purposes, or may dispose of them with other metal products through scrap metal or other recycling systems, making it difficult to ascertain the amount of containers available to collect.

As required by the Ministry of Environment, the Program will include in the annual report, for paint, a comparison of CCV to the total volume (L) sold in the same year.

In addition, the Ministry has requested that the Program try to ascertain and quantify the volume of paint containers that are being managed through alternative streams outside of the Program. Although it does not appear that already empty paint containers are being improperly disposed and other programs have attempted to perform similar analysis without meaningful results, the Program commits to investigating how the remaining containers that are not collected through the Program are being managed at end-of-life. Findings will be reported out in the annual report for the second full calendar year following plan approval.

Performance Measures and Targets

Table 2 provides a summary of CCV targets for the five full calendar years following plan approval. The Program will reassess the approach to performance measurement, once the empty container study is completed and will report results in annual report for the second full calendar year following plan approval. The Program will maintain the CCV levels achieved in the fifth calendar year and its reporting commitments until they have been reassessed.

Table 2: Container Capacity Volume Targets

Product Category	Target - (Full Calendar Years 1 to 5)
Paint (Non-aerosol & Aerosol)	4.2% annual increase in container capacity volume (CCV) based on 2016 volumes.
Solvent & Flammable liquids	8.75% annual increase in container capacity volume (CCV) based on 2016 volumes.
Pesticides	7.85% annual increase in container capacity volume (CCV) based on 2016 volumes.

In addition, the following will be published in the Program’s annual report:

- Total amount sold by product category (L)
- Total CCV by product category
- Ratio of CCV to total amount of paint sold (L)

- Total RRV collected (L)
- Annual recovery rate using RRV
- CCV by regional district by product category

As directed by the Ministry, annual values for the first five indicators above will be presented in the following format:

Year	Sales (litres)	CCV (litres)	CCV (L) / L sold (%)	RRV (litres)	Recovery rate (%)
Total Paint					

7 CONSUMER AWARENESS

Section 5(1)(iv) of the Regulation requires that “the plan adequately provides for (iv) 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...”

In order to most effectively achieve consumer awareness objectives, Product Care surveys consumers of paint and HHW to learn about program-related consumer behaviour. This allows Product Care to develop communications plans that are informed by consumer behaviour and program-related knowledge level.

Paint products, as defined in the Regulation, are used by both homeowners and professional painters, however studies have shown that professional painters generate much lower volumes of unwanted paint, about 1% of the amount purchased, but for “do it yourself” painters the leftover rate is more than 10%. Commercial painters are more experienced at determining how much paint they need for a job, and typically either use up leftover paint at another location, or leave it behind for their customers for touch ups or use it up if they have any leftovers.

The products defined under the solvent & flammables and pesticide category are household products and not industrial or commercial use products. The Program does not manage commercial HHW products.

Accordingly, for both paint and HHW, the consumer awareness survey will focus primarily on residential/consumers as opposed to the industrial, commercial and institutional sector (IC&I).

Consumer Information

PCA obtains information about the interaction of consumers with paint and HHW products from a number of sources, including surveys, sales data and other industry research. Through these sources, the Program can better assess:

- Who purchases and uses Program Product;
- When consumers consider recycling Program Product; and
- Where consumers go to find information about recycling Program Products.

This information is then used to inform the Program's strategies for raising consumer awareness.

Findings from these various sources suggest the following about consumer behaviours:

- Program Products are infrequently purchased by consumers.
- Sales data indicates that Program Products are primarily used seasonally, through spring, summer and early fall.
- Consumers seek information about recycling Program Products from a wide variety of sources with a large majority indicating that they learned about the Program through the internet and through various mass media channels (TV, radio, print advertising).
- Consumers tend to keep leftover paint for future reuse and only decide to dispose of it when the product is no longer needed or usable. Other research indicates that commercial users of Program Products, such as trades and contractors, are more efficient with their use of paint and generate less residual product than residential consumers.

While the program tracks consumer collection volumes against in-market public education activities, it is difficult to demonstrate any direct correlation between the two. Since paint and HHW are products most consumers hold onto for years, educating them today does not correlate with paint returned today. General awareness must be built over time and messaging must consistently be in market to ensure the Program's awareness messaging is heard at the time when consumers are ready to dispose of paint – typically years after purchase.

Marketing is a rapidly evolving landscape, with new technologies and the way consumers are accessing information changing constantly. Consequently, strategies and tactics can be expected to be adjusted accordingly throughout the life of the Program Plan. Given that context and the information known about consumer attitudes and consumption patterns, the Program will continue to consider using a broad range of tactics to educate consumers during peak use periods, ranging from general messaging via mass media to behaviour-specific messaging through targeted channels, such as social media. Various tactics are detailed below.

Internet

- **Program Website:** Provides information to BC residents on:
 - Collection site locations and hours of operation
 - Description of products accepted by the program
 - Details on relevant environmental handling fees
 - Annual reports and other program information

- Information for consumers on buying the right amount of paint as well as the safe storage and handling of program products
- **Website Links:** Links between the Program’s website and websites of third parties, such as regional districts, which improves the Program’s search engine ranking, provides third-party validation, and improve accessibility to Program information.
- **Reuse Websites:** Relevant Reuse sites such as *Surrey Reuses*, and others, which provides people information about the Program in the places they’re already looking for it.
- **Social Media:** Social media channels, such as Facebook, Twitter, Instagram and YouTube that serve to communicate and engage the public, share educational content about programs and respond to comments and questions received. Social media also provides an opportunity to create and disseminate targeted messaging. For example, since selling or cleaning a home are the top reasons for recycling, the Program can target those who “like” topics, brands and channels related to home improvement. The Program is also able to target those who like/follow retailers who sell Program Products to develop awareness at the beginning of the Product’s lifecycle.
- **Search Engine Marketing (SEM) and Digital Advertising:** Targeted digital ads, including Google Display and Google Search ads, that target people who are searching for information related to Program Products (e.g. “Where can I recycle paint”, “Where can I buy paint”, etc.). Digital advertising tools also target those who have previously visited the Program’s website and “retargets” them with digital advertisements.

Point of Sale and Return

- **Point of Sale (PoS) Materials:** Program brochures, posters and other informational materials available to retailers to provide to consumers. The Program regularly updates and replenishes materials upon request, free of charge.
- **Point of Return Materials:** Program signage for display and counter cards to distribute to consumers. The Program consults with collection sites to identify the type of materials and messaging to best engage consumers.

Traditional Advertising

- **Traditional Advertising:** Advertising run via traditional media channels in order to promote public education and awareness of programs. Campaigns may include general awareness campaigns, as well as campaigns focused on specific communities as needed. Potential mediums include TV, radio and print advertising.
- **Earned Media:** Pitches on newsworthy topics to traditional media reporters in an attempt to gain coverage to promote program awareness.

Community Engagement

Community engagement gives the Program an opportunity to engage directly with consumers in longer, more meaningful conversations than mass media channels, and creates an opportunity for dialogue and clarification.

- **Community Events:** Participation in community events to promote the Program. Examples of possible events include earth day celebrations, summer festivals, tradeshow, etc.

Partnerships with Credible Third Parties

To maximize its effectiveness, the Program works with other stewardship programs, local governments and third parties to provide coordinated program information and harmonized access for consumers wherever possible. For example, the Program cooperates in the creation of a joint product guide with other stewardship programs through the Stewardship Agencies of BC and, as noted above, provides a single point of consumer information through the Recycling Council of BC hotline and Recyclepedia website and smartphone app.

- **RCBC Recycling Hotline:** Recycling Council of BC's (RCBC) operates a "recycling hotline" for consumers to obtain information about the Program. RCBC hotline operators provide consumers with a convenient "one stop" contact to obtain information about PCA programs and any other recycling questions. The RCBC Hotline is typically open Monday through Friday, and is accessible to all BC residents by a toll free telephone number.
- **RCBC Recyclepedia:** RCBC Recyclepedia website and app, available for iOS and Android devices, provide information about the Program's collection sites to consumers.
- **Stewardship Program Collaboration:** Collaboration with other stewardship agencies in BC to develop common promotional materials, such as the BC Recycling Handbook.
- **Local Government Partnerships:** Working with municipalities and regional districts (RDs) to promote the Program through actions, such as:
 - Advertising in municipal garbage collection/recycling calendars.
 - Local government website links (see above).
 - Point of purchase consumer information material made available to all municipalities free of charge.

It is the experience of the Program that the measurement of awareness levels within the commercial sector is very challenging. The response rate for commercial sectors is low as there is no incentive to complete surveys and finding the appropriate person within a company and organization to respond to the survey is difficult. Survey companies do not have a sampling pool for commercial users, nor do they have an ability to determine statistical reliability as they do not have the population of commercial users, unlike census data for population. The Program will commit to a commercial user strategy as opposed to awareness targets. It should be noted that awareness strategies utilized in the residential/consumer sector for paint will naturally also increase awareness in the commercial sector.

The Program commits to the following additional strategies during the plan approval period aimed at improving the awareness level of the commercial sector.

- Attending at least two industry events annually
- Advertising in paint and coatings industry publications annually
- Within the first full calendar year following plan approval, conduct a targeted outreach to the trade painters to:
 - Identify opportunities and challenges to raise awareness of the Program
 - Develop a campaign to raise awareness amongst commercial painters
 - Provide a qualitative report on this initiative in the Program's annual report

Consumer Awareness Levels

In order to measure the awareness of consumers, the Program utilizes a third-party research firm to conduct biannual consumer awareness surveys to gauge consumer awareness of recycling options for paint and household hazardous wastes. Surveys are conducted in a manner that recognizes the demographic distribution of the provincial population.

Consumer awareness levels vary across jurisdictions and programs. Comparing awareness levels across jurisdictions and programs is generally not appropriate and can be misleading for many reasons including, but not limited to:

- Program characteristics, including program age, product types and lifespan, and characteristics of collection systems.
- Surveying methodology, including timing of the survey and method of capturing responses, etc.
- Consumer habits, including who purchases and uses the product within a household, percentage of the population that uses the product etc.

Unlike other consumer products, paint is a product that is used by only a portion of the population, and on an infrequent basis. Most households will only use paint every 5-7 years and then store the leftover product for even longer intervals before deciding to recycle. Studies show that a high percentage of homeowners purchase paint, but only a minor proportion of renters. Virtually all households indicate that one person in the household is responsible for recycling Program Products. Therefore, it is reasonable to expect that awareness levels will be lower than for stewardship programs of other products that are consumed on a regular and frequent basis. PCA measures the awareness of those who indicate they have purchased program product to identify patterns and trends among users.

PCA's consumer awareness tactics promote paint and HHW products as a group of products under one stewardship program, and accordingly awareness is measured for the group of products, rather than individual product categories.

PCA has conducted consumer awareness studies since program inception. Awareness surveys since 2013 have consistently found that more than 60% of consumers are aware of a program for recycling paint.

Performance Measures and Targets

The Program will continue to utilize the various communications activities discussed above as required, as well as continue to develop and refine strategies for identifying where gaps in awareness exists and targeting specific market segments. This includes support of retailers through the provision of point of sale materials, as well as educating commercial contractors through various channels. The Program will report out annually on consumer education activities.

Consumer awareness surveys will be conducted every two years, starting in 2019 with findings reported in the Program's annual reports. In the context of existing awareness levels, the characteristics of the products and the primary users and the frequency of use (discussed above), the Program will target a consumer awareness level of 70% or more for paint and HHW products. The Program will continue to maintain consumer awareness levels and report out against related commitments and targets after the fifth complete calendar year from date of plan approval until they have been reassessed. The Program will conduct an analysis of residential consumers to identify sub-groups of residential consumers who are the primary users of the Program Products, and develop a strategy to engage them, within six months from the date the plan is approved. The Program will report its consumer awareness level in the annual report and provide a qualitative report on product categories that may require additional focus to increase awareness. In addition, the Program will report out on the survey question used and a summary of the survey methodology employed.

See Consumer Information section (above) regarding commercial awareness commitments.

8 MANAGEMENT OF PROGRAM COSTS

The Program is funded by Environmental Handling Fees (EHF) paid to PCA by its members based on the quantity of the designated products sold or supplied in BC. The EHF may appear at the time of retail sale as a separate charge or be integrated into the product price and is subject to retail sales taxes. The EHF is not a tax or a refundable deposit. Program revenues fund program operations, including but not limited to:

- Administration,
- Public education and communication
- Collection, transportation, recycling and responsible disposal of collected products, and □
Establishing and maintaining a reserve fund.

The reserve fund is used to stabilize program funding in the case of unexpected collection volume increases, fluctuations in operating costs or reduced revenue due to economic or other factors. The reserve fund is also intended to cover the cost of winding up the Program in the event of regulatory changes.

EHF rates are set by PCA and are subject to change as needed to ensure there are sufficient funds to operate the Program and maintain the necessary reserve in accordance with PCA's policies. Current EHF's for Program Products are listed on the PCA's website, www.productcare.org.

The Program's audited financial statements are posted on PCA's website as part of the Program's annual report.

9 MANAGEMENT OF ENVIRONMENTAL IMPACTS

The Program seeks to divert, as much as possible, Program Products from the waste stream and manage them according to the pollution prevention hierarchy. Considerations include the availability of appropriate technology, qualified service providers, sufficient economies of scale, whether management is financially practical, and the existence of end markets for commodities.

9.1 Reduce and Redesign

The ability of a stewardship program of this scope to influence product design is limited. The paint industry is a consolidating industry and most brand owners manufacture for a market area that includes more than one province or country. The overall program objective is to reduce the environmental impact of Program Products through the application of the pollution prevention hierarchy of reduce/reuse/recycle.

The composition of many of the paint products covered by the Program have changed over time as a result of design for environment activity. In particular:

- There has been a steady shift in the marketplace from oil based (alkyd) paints to water based latex paints. This trend is expected to continue as consumer preference for latex paint increases and technical specifications improve.
- Federal regulations relating to volatile organic compounds and the composition of surface coatings are hastening the process of reducing the environmental impact of paint products.

Tools used by PCA that may have an impact on product life cycle and reduction of environmental impact include:

- Applying variable EHF's, which increase with the size of the container
- Promoting the "B.U.D." rule (i.e. **B**uy what you need, **U**se what you buy and **D**ispose of the remainder responsibly)
- Educating consumers on the proper storage of leftover paint
- Researching alternative management options for collected materials

9.2 Reuse and Recycle

Leftover paint is the largest volume of the Program Products managed by the Program. Leftover paint can be managed in a number of different ways while there are limited options for the management of other HHW products. The processing of paint and HHW is a multi-step process involving primary processors, downstream processors, and final recycling and/or disposal facilities. During the process, the products are typically consolidated and processed with similar compatible products from other waste generation sources, such as waste from manufacturing.

Reuse

Reusable paint is given away at no charge through the Paint Reuse program to consumers to be used for its originally intended purpose. Approximately 2.8% of the total volume of paint collected in 2016 was reused through the Paint Reuse program. Paint Reuse is high on the pollution prevention hierarchy and also provides economic efficiencies for the Program.

Paint available for reuse must meet certain requirements:

- Containers must be at least half full
- Containers need to be in good condition
- Paint aerosols are not a part of the Paint Reuse Program

The Program has no control of the volumes of paint returned that meet the requirements for reuse and are made available by consumers or generators. The Program does promote the proper handling and storage of leftover paint so that the quality of the paint can be maintained for use at a later date or brought into the Program for reuse and recycling. Paint Reuse is not suitable for all collection sites. Users of the Program included individuals, community organizations, theatres and anti-graffiti programs. Many consumers obtained information about the Paint Reuse program through the RCBC Materials Exchange program.¹⁰

Paint Reuse is a method of recycling under the pollution prevention hierarchy and although not an accessibility obligation, the Program will continue to look for ways to expand this service. The paint collection system consists of 219 collection sites of which 43 are retailers and 176 are not. Retailers in the business of selling paint do not participate in Paint ReUse. Of the 176 non-retailer paint collection sites, 84% (148 collection sites) participated in Paint Reuse in 2016. Some non-retail collection sites do not have the capacity (space, staffing) to participate. Consequently, there is limited opportunity to expand the program further within the current collection network.

Reuse is not an option for HHW products due to:

- Regulatory requirements that impose criteria/limitations on the use of ingredients and allowable concentrations;
- Regional bans on certain pesticide use;
- Contamination of the product through use (i.e. oil contaminated gasoline).

Recycling

Paint-to-paint recycling is heavily dependent on whether there is a demand or market for the recycled paint. In addition, a number of different factors such as age, quality, and physical state of the paint returned, impacts whether paints are suitable for recycling or not. Other limitations include, but are not limited to:

- Recyclable paint is already tinted and there is limited ability to alter the colour of recycled paint;

¹⁰ <http://www.rcbc.ca/services/materials-exchange>

- Selling recyclable paint requires more shelf space at retail versus just carrying virgin base paint and adding tint at the counter;
- Regulatory requirements, such as the Volatile Organic Compound (VOC) Concentration Limits for Architectural Coating Regulation that limit the concentration of VOCs.

Recycling alkyd paint back into paint is more difficult due to a number of factors:

- Hazardous waste and transportation regulations, which limit the movement of this kind of material.
- Old paints tend to be higher in VOCs, making recycling of alkyd paints more difficult.
- The chemistry of alkyd paints makes it more difficult to recycle into paint and coating products.
- The market for alkyd products is significantly smaller than that for latex paint products and is diminishing making it more difficult to find end markets for the recycled product.
- Latex paint technology has improved significantly such that new formulations equal or outperform the performance of alkyd paint.

In addition to paint-to-paint recycling, latex paint may be used as a raw material in certain manufacturing processes, such as the manufacturing of concrete products (i.e., utility blocks, etc.). As with paint-to-paint recycling, there are limitations on the amount of latex paint that can be utilized in this manner. Utilizing alkyd (oil-based) paints in concrete manufacturing is not an option due to its chemical properties.

In 2015, 79% of the latex paint was either recycled into paint or utilized in the manufacturing of concrete products. While PCA strives to recycle as much of the latex paint collected as possible, management options are dictated by the quality of paint received from consumers, which is beyond the Program's control. Paint of certain colour or chemical composition, poor quality or paint that is solidified cannot be recycled. In such instances, the product is used for energy recovery or landfilled (see below). In addition, unlike virgin paint, there is limited ability to adjust the colour of recycled paints, which limits the choice of consumers; a factor which limits demand for recycled latex paint and which is beyond the Program's control.

Unlike paint, HHW products encompass a very broad range of product categories, industry sectors, product types and uses with different uses/applications, ingredients, concentrations, physical state, etc. Consumer HHW products generally come in smaller packages. Some ingredients in older products are no longer allowed to be in use or sold in the marketplace. There are also very few recyclers that can handle these product categories, none of whom are in BC. These factors all contribute to increased costs to manage these products, as well as reduce program efficiencies and the ability to recycle products. For these reasons and others, HHW products are not recycled.

Energy Recovery:

As noted above, not all paint is suitable for recycling and as such, requires alternative management options. Depending on the type of paint, paints (including latex) typically have varying degrees of heat value, which makes them more or less suitable for energy recovery, especially alkyd paints. Some cement kilns and incinerators have the necessary environmental approvals or permits to allow the use of alternative fuel, such as paint, in place or in conjunction with traditional fuel sources, such as natural gas. Energy recovery may continue to be one of the options utilized for the management of all paint products.

In 2015, 7% of latex paint and 100% of oil-based paint collected was sent for alternative energy recovery at permitted/licensed facilities.

For certain HHW products, such as flammable liquids and gasoline, their nature and chemical composition, along with the fact that many are sold as fuels, makes them ideal for energy recovery. Energy recovery is not an option for other HHW products, such as pesticides. Pesticides need to be treated at temperatures high enough to avoid creating hazardous by products. In addition, pesticides and paints that are contaminated with Polychlorinated Biphenyls (PCB) require dedicated incineration at licensed and permitted facilities. In 2015, 100% of solvent and flammable liquids and gasoline were sent for energy recovery. In 2015, 100% of the pesticides were sent to incineration.

Disposal

In many jurisdictions, solidifying and landfilling latex paint is a regulatory acceptable practice. Landfilling is the least preferred option for latex paint, but may be a necessary option depending on the market conditions. With the increase in collected volumes and limited capacity of some of downstream processors, not all unrecyclable latex paint can be sent for energy recovery. As a result, a portion of unrecyclable latex paint may need to be solidified and landfilled. In 2015, 14% of latex paint collected was diverted to a secure landfill.

HHW and alkyd paint are typically prohibited from landfills. Accordingly, landfilling is not considered as an option for these types of products.

9.3 Containers

Paint and HHW products are typically packed in metal or a variety of different types of plastic containers. While the market exists for metal and plastics recycling for cleaner and more voluminous product streams, the uniqueness of paint and HHW containers poses a number of challenges to recycling these containers once they have been emptied of their contents. These challenges include, but are not limited to:

- Being less attractive to recyclers if the container contents were of a hazardous nature (e.g., pesticides) requiring special handling pursuant to regulation prior to recycling or alternative management,
- Being unable to completely clean containers, as cleaning often results in more waste generation,
- Paint and HHW containers being considered low grade and less desirable by metal and plastic recyclers,
- Protective coatings on metal cans that pose challenges for the recycling system,
- The low volume and inconsistency of type and colour of plastic of containers compared to other sources of plastic;
- Fluctuations in commodity pricing and market demand, and
- The limited number of recyclers that have the ability to handle such products.

These issues can limit the recycling of paint and HHW containers at times, thus requiring alternative management options, such as energy recovery or landfilling. Table 3 details the management options

utilized for Program Products and their associated containers in 2016. Product management commitments and targets are detailed in section 11 below.

Table 3: Summary of Management Options 2016

Method	Explanation	Paint		Solvent & Flammables Liquids		Pesticides		Gasoline	
		Residuals	Containers	Residuals	Containers	Residuals	Containers	Residuals	Containers
Reuse	Given to a consumer in original condition through "Paint Reuse"	2.8%	--	--	--	--	--	--	--
Recycling	Reprocessed as paint, used in concrete and cement manufacture	81% of latex paint	100% of metal and #2 plastic containers	--	100% of metal containers	--	100% of plastic containers	--	100% of metal and plastic containers
Energy Recovery	Alternative fuel	100% of oil based paint, 2 % of latex paint	98% of polypropylene cans	100%	--	--	--	100%	--
Incineration		--	--	--	--	100%	--	--	--
Landfill		17% of latex paint	--	--	--	--	--	--	--

Performance Measures and Targets:

The Program will track and report on the following information annually in its annual report:

- Significant developments, provided by its membership, that reduce the environmental impact and improve the recyclability of Program Products, as applicable.
- Percentage of collected paint reused and recycled.
- Number of collection sites offering Paint Reuse.
- The approximate percentage of program products and containers managed according to the pollution prevention hierarchy.

Recognizing that the product management is subject to change, the Program will:

- Target a minimum recycling rate of latex paint of 75%.
- Continue to seek options for the recycling of oil-based paint.
- Strive to recycle 100% of the metal and #2 plastic paint containers processed and shipped.
- Strive to recycle 100% of the metal and #2 plastic gasoline containers processed and shipped.

The Program commits to developing a communications strategy focussed on Paint Reuse within two years of Plan approval and provide a summary report in the corresponding annual report.

Unless otherwise indicated, all performance requirements, commitments and targets apply to the first full five calendar years following plan approval. Following that period, the Program will continue to maintain and report out against the above targets and commitments until they have been reassessed.

10 DISPUTE RESOLUTION

The Program contracts with all suppliers and service providers by way of commercial agreements. Any disputes are resolved through normal commercial dispute resolution practices set out in the terms of each contract, including negotiation, mediation, arbitration and legal proceedings, if required.

11 PERFORMANCE MEASUREMENT SUMMARY AND REPORTING COMMITMENTS

The objective of stewardship programs is to ensure that stewarded products are diverted from landfill and are managed responsibly and in accordance with the highest possible use on the pollution prevention hierarchy, where feasible. This Stewardship Plan sets out a number of performance metrics, which collectively, illustrate the Program's success. First, accessibility targets ensure that British Columbians have reasonable and free access to the Program's contracted collection sites. Second, consumer awareness targets demonstrate that the public is aware the Program exists, knows the collection network is available and understands how to manage Program Product at end-of-life. Third, reporting of collection volumes and the significant increases in recent years, despite flat product sales, evidences that British Columbians are not only aware of the Program, but are utilizing it. In addition, the Program will continue to participate in waste audits. The Program will continue to report out on waste audits to provide evidence that Program Product is being managed through the correct pathways. Collectively, these metrics evidence a robust and successful Program.

The following is a summary of the commitments and targets set out in the Program Plan. The Program Plan sets out commitments and targets up to 2022, including those associated with the management of

environmental impacts. All metrics identified, as well as all targets associated with the management of environmental impacts, except paint reuse, are subject to annual audit. The Program will continue to maintain and report out on performance measures, including management of environmental impacts, after 2022 in accordance with the parameters detailed under the relevant sections above until commitments and targets have been reassessed.

Performance Metric		Reporting Commitment/Target	Subject to Audit
Collection System and Accessibility			
Number of collection sites		Maintain a minimum of 219 contracted collection sites in total	Y
		Report annually on the number and location of contracted Paint collection sites and PaintPlus collection sites	Y
		Report annually on the number of contracted collection sites, along with their location by city and regional district	N
Number and location of collection events		Report annually	N
Percent of population with access to a collection site		Maintain a minimum of 95% accessibility rate to a collection site based on SABC Accessibility Standard for Paint and PaintPlus collection sites respectively.	Y
Accessibility study		Conduct accessibility study every five years (by end of 2021)	N
Waste Audits			
Commit to participating in all waste composition studies committed to by SABC and report out on number and location of waste composition studies conducted		Report annually	N
Units of program product identified during waste composition studies		Report annually	N
Collections			
Percentage annual increase in container capacity volume (CCV) based on 2016 volumes	Paint (Non-aerosol & Aerosol)	4.2% annual increase	Y
	Solvent & Flammable liquids	8.75% annual increase	Y
	Pesticides	7.85% annual increase	Y

Performance Metric	Reporting Commitment/Target	Subject to Audit
Total volume collected by product category using CCV	Report annually	Y
Volume collected by regional district by product category using CCV	Report annually	N
Total amount sold by product category (L)	Report annually	Y
Total RRV collected (L)	Report annually	Y
Recovery rate	Report annually	Y

Ratio of CCV to total amount of paint sold (L)	Report annually	Y
Investigate how the remaining containers that are not collected through the Program are being managed at end-of-life	Report out in the annual report for the second full calendar year following plan approval.	N
Consumer Awareness		
Consumer awareness survey	Conduct every two (2) years starting in 2019 and report in the annual report	N
Percent of population aware of the program	70% or more for paint and HHW.	N
Commit to a targeted commercial sector strategy for paint: <ul style="list-style-type: none"> • Attend at least two industry events • Advertise in paint & coating industry publications • Trade painter targeted outreach 	<ul style="list-style-type: none"> • Report annually • Report annually • Report out in annual report for the first full calendar year after plan approval 	N
Consumer education activities	Report annually	N
Conduct an analysis of residential consumers to identify sub-groups of residential consumers who are primary users and develop a strategy to engage them.	Within six months from the date the plan is approved	

Report consumer awareness level in the annual report and provide a qualitative report on product categories that may require additional focus to increase awareness.	Report annually	
Report out on the survey question used and a summary of the survey methodology employed.	Report annually	
Management of Environmental Impacts		
Significant developments, provided by its membership, that reduce the environmental impact and improve the recyclability of Program Products, as applicable	Report annually	N
Percentage of collected paint reused and recycled	Report annually	N
Number of collection sites offering Paint Reuse	Report annually	N
Approximate percentage of program products and containers managed according to the pollution prevention hierarchy	Report annually	N
Develop a communications strategy focussed on Paint Reuse	Within two years of plan approval and report in corresponding annual report	N

Management of Environmental Impacts - Annual Targets*									
Method	Explanation	Paint		Solvent & Flammables Liquids		Pesticides		Gasoline	
		Residuals	Containers	Residuals	Containers	Residuals	Containers	Residuals	Containers
Reuse	Consumers use leftover paint through "PaintReuse"	--	--	--	--	--	--	--	--
Recycling	Reprocessed as recycled paint or additive	Minimum 75% of latex paint	Strive for 100% of metal & HDPE (#2)	--	Strive for 100%	--	Strive for 100% of metal & plastic	--	Strive for 100%
Energy Recovery	Alternative fuel	100% of oil based paint	100% of polypropylene (#5)	100%	--	--	--	100%	--
Incineration		--	--	--	--	100%	--	--	--
Landfill		--	--	--	--	--	--	--	--

* Unless otherwise indicated, all performance requirements, commitments and targets apply to the first full five calendar years following plan approval.

APPENDIX A: BC PRODUCT CLASSIFICATION DECISION TREE FOR SOLVENT AND FLAMMABLE LIQUID PRODUCTS

This Decision Tree is intended to be used to determine if liquids and aerosols are included in the British Columbia flammable liquids category ONLY. For other regulated materials in PCA's BC programs, please review the [BC Accepted Products List](#). Please note that there may be differences in the product classification criteria under the flammable liquids category in each of the provincial HHW stewardship programs. Therefore, the status of a product under one provincial stewardship program may not reflect its status under another provincial program.

STEP 1: Is your product listed below?

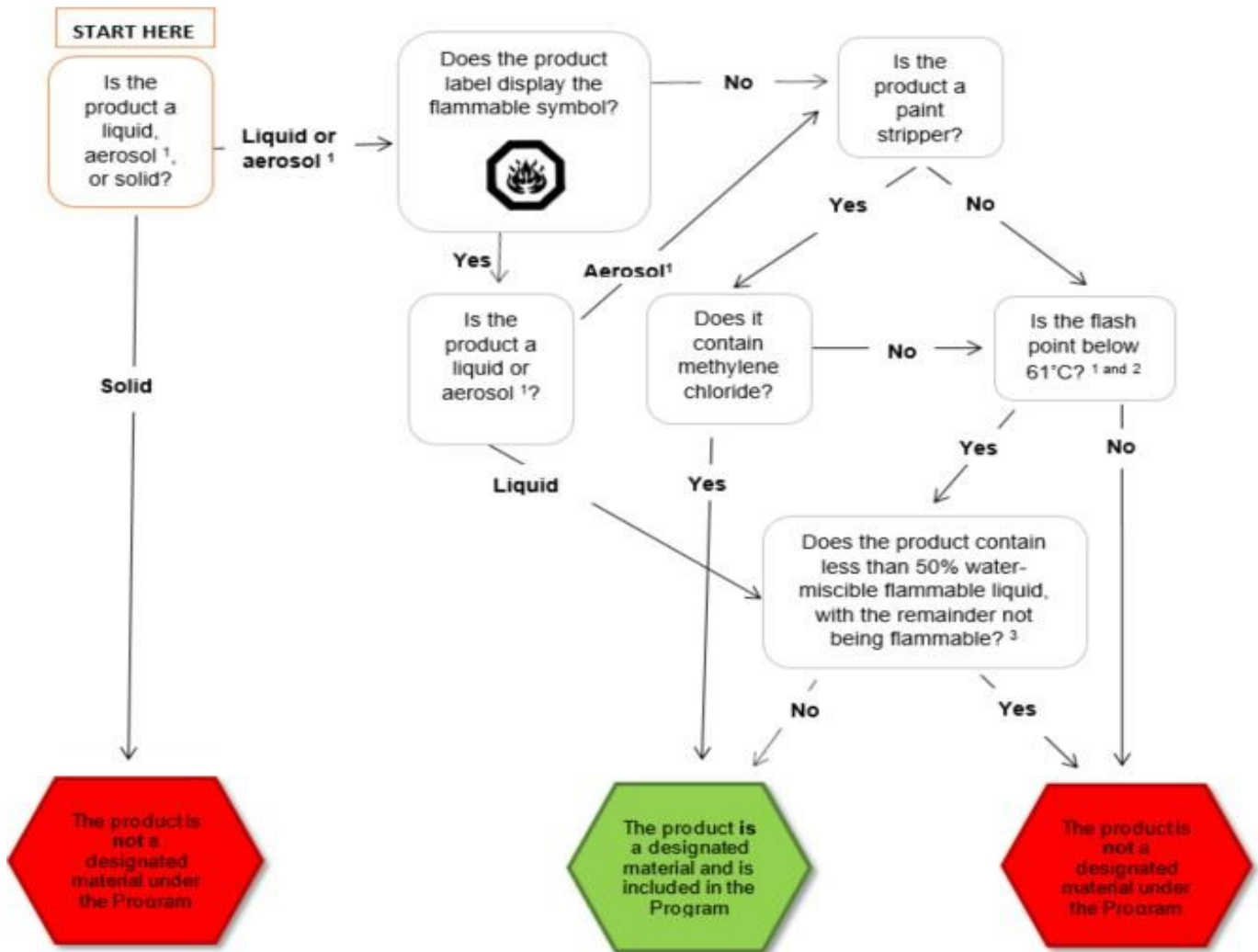
If yes, the product is **NOT** a designated material under the program and is excluded from the program. If no, the product may be included in the program; *proceed to Step 2.*

- Wine and distilled spirit beverages
- Cosmetic and beauty products
- Drugs, medicines and other health products
- Unpackaged products or products not ordinarily sold to, used or purchased by a consumer without repackaging
- Pre-packaged products produced for use by commercial or industrial enterprises without resale to other consumers as pre-packaged goods
- Products in the paint product category
- Coatings formulated for industrial or automotive use
- Pre-packaged kerosene in containers larger than 9 litres
- Product has a WHMIS or GHS label (symbol contained in red diamond)
- Windshield washer fluid
- Products sold in containers greater than 10 litres for flammable liquids or greater than 680 grams/24 ounces for aerosols

STEP 2: Is your product a pesticide (has a PCP number)?

If your product is a pesticide, then you should evaluate that product according to the pesticide material definition; see the Pesticide Category in the accepted products list [here](#) and do not proceed to Step 3. Otherwise, proceed to Step 3.

STEP 3



1. The definition of flammable liquid applies to liquid intermediates or product concentrates in aerosols. The Consumer Chemicals and Containers Regulations, 2001 (CCCR) regulates hazard labelling for consumer products in Canada. Although the labelling criteria for flammable aerosols is dependent on flame projection and not flashpoint it is generally true that aerosol products with flammable symbol (having a flame projection of greater than 15 cm) would contain a product concentrate that meets the definition of a flammable liquid. In the event that flame projection does not accurately capture flammable liquid as defined in the BC Recycling Regulation, the flashpoint of the product concentrate will take precedence.

2. Flash point limit specified per BC Recycling Regulation. BC Recycling Regulation specifies for the flashpoint to be measured using the ASTM D1310 Tag Open Cup Test Method.

3. Exception: Products containing less than 50% water-miscible flammable liquid by volume with the remainder of the product not being flammable are excluded (with reference to the *National Fire Code of Canada, 1990*, as published by the National Research Council of Canada and cited in the BC Recycling Regulation).

APPENDIX B: STAKEHOLDERS WHO ATTENDED AT THE CONSULTATIONS

During the consultation process, many organizations registered to participate in one or more consultation sessions, representing a range of affected constituencies, including Indigenous communities, government, industry, non-profit organizations and program service providers. The following is a list of 56 organizations that participated in the consultations.

Organization Category	Number of Individuals
Government	26
BC Product Stewardship Council	1
Capital Regional District	1
Cariboo RD	1
City of Kamloops	1
City of Richmond	2
City of Vancouver	2
Comox Valley Regional District	1
Cowichan Valley Regional District	3
Fraser Valley Regional District	1
Metro Vancouver	1
North Coast Regional District	1
Peace River Regional District	2
Regional District of Bulkley-Nechako	1
Regional District of Central Okanagan	1
Regional District of Fraser-Fort George	1
Regional District of Kitimat-Stikine	2
Regional District of Kootenay Boundary	1
Regional District of Nanaimo	1
Regional District of North Okanagan	1
Squamish-Lillooet Regional District	1
Industry	16
Canadian Consumer Specialty Products Association (CCSPA)	1
Canadian Tire Corporation	1
Costco Wholesale Canada Ltd.	2
Loblaw Companies Ltd.	1
Orgill Canada Hardlines ULC	1

PPG Architectural Coatings Canada	2
PPG Architectural Coatings Canada Inc	2
Radiator Specialty Company of Canada	1
Reeve Consulting	1
RONA	1
SC Johnson	1
Scotts Canada Ltd.	1

Organization Category	Number of Individuals
Uline Canada Corp	1
Non-Profit	4
Coast Waste Management Association	1
Kitimat Understanding the Environment	1
Let's Talk Trash	1
Recycling Council of BC	1
Other	4
Envirotech	2
Holly Munn Communications	1
In.tent Planning	1
Service Provider	6
Interior Freight & Bottle Depot	1
Nanaimo Recycling Exchange	2
Parksville Bottle & Recycling	1
Pender Island Recycling Society	1
The Battery Doctors	1
Total Individuals Attending	56

APPENDIX C: SUMMARY OF STAKEHOLDER FEEDBACK AND RESPONSES

Feedback received at the consultation events and via email is summarized in the table below. Questions/comments have been grouped according to each section of the Program Plan. PCA’s response is provided for each question/comment, including whether it has been addressed in the Program Plan, if applicable.

4. PROGRAM PRODUCTS			
Question #	Sector	Question/Comment	Response
P1	Local Government	Is Product Care Planning to expand to include other HHW Materials or products?	The products managed by the programs are designated in the Recycling Regulation. PCA is not aware of any proposed additions to that regulation.
P2	Service Provider	Paint program material mentions that the program only accepts residential volumes of paint. What are you doing to capture commercial volumes of paint?	The Program accepts architectural paints and all aerosol paints, regardless of volume or category of user (i.e., includes both residential or IC&I users). Large volume drop offs can be made at collection sites by appointment. The Program also offers large volume direct pickup services for qualifying entities.
P3	Service Provider	There is confusion around commercial paint products and who can drop them off and there are product lists available for other programs. What can be done about identifying products to reduce this confusion?	The Program accepts architectural paints and all aerosol paints, regardless of volume or sector (residential or IC&I). Other than aerosol paints, industrial paint products are excluded from the program. The Program's signage and websites provide detailed information about what products are included and excluded. In addition, the Program is in the process of updating its product guide to address this issue.
P4	Local Government	Acceptable product list – is there future plans to expand that list? We have a program including PCA and no PCA. There are a lot of items from retailers we get that are not included in your product list.	See response to question P1 above.
P5	Service Provider	Are any new products being added to PCA’s program?	See response to question P1 above.

4. PROGRAM PRODUCTS			
Question #	Sector	Question/Comment	Response
P6	Local Government	Contradiction of accepted materials on page 5 of the plan: mineral spirits and paint thinner listed as accepted, and then also listed as non-program products on page 6. Some clarification?	Clarification has been made in the Program plan
P7	Non-Profit	One of the issues we run into regularly - indeed it came up again yesterday - is the difference between industrial and residential paint products. When residents can purchase industrial products in the same aisle as residential ones at the store, this distinction becomes very problematic. For example, as far as we can tell, there is nothing specialized about this paint except it is labeled as automotive. We would encourage you to consider amending the submitted stewardship plan to require all paint products purchased through typical retailers be subject to an Eco-Fee so they are accepted into the program.	The Recycling Regulation defines paint product category as "... latex, oil and solvent-based architectural coatings, including paints and stains for commercial and household use..." It does not include "industrial" products, other than in aerosol form.
P8	Non-Profit	I am also confused about the potential conflict between materials listed under both the accepted and non-accepted list Accepted Paint Products: <ul style="list-style-type: none"> • Mineral spirits • Paint stripper • Paint thinner • Paint and vanish remover • Turpentine • Varsol • Other flammable solvents Non-Accepted Paint Related Products: Paint thinners, mineral spirits or solvents	The classification of program products has been clarified in the Program Plan.

4. PROGRAM PRODUCTS

Question #	Sector	Question/Comment	Response
P9	Non-Profit	The statement in the list of accepted paint items under the proposed plan update states: Interior & Exterior: latex, acrylic, water-based, alkyd, enamel, oil-based consumer paints when above it clearly defines accepted paint as: (a) latex, oil and solvent-based architectural coatings, including paints and stains for commercial and household use , whether tinted or untinted, and including empty containers for any of these. Further to my previous feedback, to reduce confusion here, this should be consistently worded throughout the document especially in the list of accepted materials which will likely be the most referenced section.	The classification of program products has been clarified in the Program Plan.
P10	Non-Profit	I understand, at this point, the materials accepted under HHW include flammable liquids, pesticides, and gasoline only. I am respectfully requesting that an amendment to the Recycling Regulation be investigated to include bleaches and corrosive materials whether it be in addition to the HHW materials under Product Care's mandate or through an additional stewardship plan, these materials are hazardous enough to warrant a warning label but are currently not eligible for any end of life programs.	See response to question P1 above.
P11	Non-Profit	Road and traffic marking paints are also an item we get contacted about annually. Whether or not they are accepted into this program, there should be an avenue for disposal available for these products that does not involve utilizing a specialized waste hauler to deal with an empty can.	The Program is only responsible for product categories identified under the BC Recycling Regulation. The issue of managing non-obligated products should be referred to the Ministry of Environment.

P12	Industry	Clarity on definitions - what is in and out of the program: The document uses “shortcuts” in describing products, such as what is included and how it should be classified. This raises questions and issues for members. For example, as noted above, referring to the whole program as BC PaintRecycle, when in fact it is the whole Paint and HHW program, leads to confusion. The details in describing programs and product definitions are extremely important and need to be clarified. As one specific example, flammable symbols are found on aerosol products. The symbol is	The plan has been amended to provide further clarity with regard to product definitions. PCA intends to continue working with CCSPA to discuss product definitions that comply with the regulations and are as easy as possible to interpret by retailers, consumers and collection sites.
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4. PROGRAM PRODUCTS			
Question #	Sector	Question/Comment	Response
		there based on flame extension. This does not necessarily mean the liquid in the aerosol has a flash point that would meet the definition of a flammable liquid under the BC Recycling Regulation. The program needs to clearly reflect what is captured by the Regulation only. This needs to be clarified for all products, so that stewards are paying accordingly.	
P13	Local Government	Is PCA planning program collaboration with BC Used Oil Recycling? Residents do not necessarily distinguish that there are two separate programs for gasoline and oil.	Generally, the automotive industry is a different industry than the paint and HHW industry. However, on an operational level, the Program seeks to partner with other stewardship organizations wherever possible to make the collection of stewarded products more efficient for consumers (e.g., one stop shop).
P14	Local Government	There are a lot of products we received and we are covering the costs currently and they are quite sizable. Was wondering about putting forward those products. For example, flammable products or some paint products.	The determination of product categories is set by the Ministry and is outside the scope of the Program Plan. During the webinar, Ministry representatives invited the person asking the question to follow up with them directly about which products are regulated and which are not.

P15	Industry	Marine paints and Wood preservatives - The way it is, people may look at it and simply dismiss the need to include these paints (since the plan says they aren't part of the paint category) but they still need to be part of the pesticide category to facilitate diversion and also to help pay their share.	The representation of products in the Products section of the Program Plan has been modified in response to the comment.
P16	Service Provider	There are areas where the program does not take responsibility for the empty container even though a consumer has paid the eco fee. This becomes a cost to the depot for disposal. Not accepting the empty container does not eliminate the issue, as some consumers will abandon the container if given the opportunity. These containers may be empty, but they are still contaminated and should be the programs responsibility.	The Program manages empty containers that are obligated under the regulation.

4. PROGRAM PRODUCTS

Question #	Sector	Question/Comment	Response
P17	Industry	Opportunity for harmonized provincial definitions: solvents/flammables - CCSPA and our members keep top of mind that we were working with PCA toward standardized definitions such as for solvents/flammables: definitions that are science based and can work in multiple provinces such as BC, Manitoba, Ontario and Nova Scotia.	PCA agrees with CCSPA as to the benefit of harmonizing product definitions. PCA is participating in the process developed by the Canadian Council of Ministers of the Environment (CCME) to harmonize definitions and we continue to do so in collaboration with CCSPA and other industry stakeholders. We will work through PCA's Paint/HHW Advisory Committee for this purpose.
P18	Industry	Future harmonization opportunities: pesticides - Provincial harmonization is equally important going forward for other materials, such as for pesticides and in future, in programs such as Nova Scotia. There is an opportunity to get the Nova Scotia definitions right, from the start. That will mean not necessarily following what we have in the current BC program in many cases. These definitions need to be open to discussion. As above, CCSPA is willing to continue to work with PCA toward this goal.	See response to question P17 above.

P19	Industry	<p>Page 5- If the Plan is going to quote the regulations, I would recommend a full quote. Otherwise, it leaves the reader wondering what subsection (2) is about and if not researched, the reader might not understand the full meaning of "pesticides". Subsection (2) is as follows:</p> <p>(2) The pesticide product category does not include the following:</p> <ul style="list-style-type: none"> (a) insect repellents; (b) sanitizers and disinfectants; (c) pet products; (d) unpackaged products or products not ordinarily sold to, used or purchased by a consumer without repackaging. 	The plan has been modified as suggested.
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4. PROGRAM PRODUCTS			
Question #	Sector	Question/Comment	Response
P20	Industry	<p>"Skull and cross bones" (page 5) - These are really explanatory notes and therefore, they can be a bit more fulsome in the explanation. The BC regulations only reference the shapes of the symbols by virtue of referring to Schedule III. By definition under the PCP Act and Regulations, if a label uses these symbols referenced under the PCP Regs, the labels must also use the wording under the PCP Act and Regs. In other words, the symbols and wording are inseparable if required on a label.</p>	The representation of products in the Products section of the Program Plan has been modified in response to the comment.
P21	Industry	<p>4.2 Non-Program Products - To me, this section is confusing since it does not say which program -- is it the paint program or the HHW program? Which program? By clearly identifying the program, it will help to put the inclusions or exclusions in the right context. Should it say the following? : The Paint Program does not collect ...</p>	The Program plan has been modified in response to the comment.

P22	Industry	"Paint or wood preservatives", section 4.2 - Assuming it is the paint program then I suggest saying: Paints, Marine Paints or Wood Preservatives that are registered as a pesticide under the Pest Control Products Act and meet the definitions as outlined in this document under section 4.1(c) "Pesticides", will be included as a pesticide and not included as a paint. Without this directive, one might look at it and think that the Program does not collect these items under any category and not bother to report them.	The Program plan has been modified in response to the comment.
P23	Industry	Second paragraph - I would even add: Pesticides that do not meet the definition as set forth Section 4.1(c) of the Plan. Or alternatively, Those pesticides whose label does not bear the "DOMESTIC" classification in addition to the term "Danger", "Warning" or "Caution - Poison" and the "skull & crossbones" symbol. Without it, it leaves the reader thinking that all pesticides are included, including non-poisonous ones.	The Program plan has been modified in response to the comment.
4. PROGRAM PRODUCTS			
Question #	Sector	Question/Comment	Response
P24	Industry	Second paragraph, third bullet point - I would add in brackets (e.g. agricultural pesticides which are managed by CleanFarms). This explains why they are not collected and points the reader in the right direction if they have agricultural products.	The Program plan has been modified in response to the comment.

5. STAKEHOLDER CONSULTATIONS			
Question #	Sector	Question/Comment	Response

S1	Local Government	5. Stakeholder Consultation, Page 7: “Consulting with National HHW Advisory Committee members” Information on this committee could not be located on the Product Care/Regeneration website. Who sits on this committee and what is its mandate?	The National HHW Advisory Committee was established in 2016. It is comprised of industry representatives from HHW product and business sectors (manufacturers, retailers, trade associations). It deals mainly with product technical matters such as definitions. Information about the Committee’s mandate has been incorporated into the program plan. PCA generally does not post the list of committee members on its website.
S2	Industry	The deadline for written comments to Product Care was April 14, 2017, which afforded just two weeks to review and collect meaningful comments. We appreciate that on April 13, 2017, PCA was able to confirm an extension to April 21, 2017, for CCSPA. Given the members have a great many other provincial and federal priorities to deal with, we are able to provide only topline comments and hope that the following requests can be accommodated to assist our members in understanding the revised plan.	The first consultation notice was sent on March 10, 2017 and the draft plan was posted on March 9, 2017. A reminder was sent to all stakeholders on March 13 and, as noted, extended upon request.
5. STAKEHOLDER CONSULTATIONS			
Question #	Sector	Question/Comment	Response
S3	Industry	Given the short opportunity for consultation, CCSPA requests that PCA provide a clear comparison of the existing and proposed programs, and the specific cost or other impacts on the steward companies. While some members have been able to take a closer look, others have not had this opportunity. As well, some are asking questions; as the wording is often not clear; and we need to know if there are any intended changes to what is in or out of the program. A comparison is needed to help members understand the changes and impacts, if any.	The program plan does not propose any changes to included/excluded products.
S4	NA	How many people attended the [CWMA] consultation?	Thirty-three people attended the consultation held at CWMA in October 2016.

S5	Local Government	Will the [slides from the March 14th] presentation be sent out to participants?	Powerpoint slides were made available to all the participants who participated in the webinar consultations.
S6	Service Provider	When is the next webinar in this process over the next few weeks or months?	In person consultations were held at the CWMA conference on October 18, 2016. Webinar consultations were held on March 14, 16 and 30th.
S7	Industry	Would that be possible to get the slide deck after today?	See response to question S5.
S8	Local Government	Will the presentation be sent out?	See response to question S5.

6. COLLECTIONS			
Question #	Sector	Question/Comment	Response
C1	Local Government	One of the values you were tracking with respect to containers. The earlier slide referred to container volume that would be coming back - would you not just be tracking number of containers that came in? You did have a recovery volume of actual paint, etc. the total amount would be number of containers coming back into your program.	The Program does not count and track the actual number cans or containers collected. The Program utilizes a couple of different types of collection containers (drums, tubskids), in which paint cans/pails/other containers are collected and transported. To provide a consistent and uniform approach to reporting on collections, the Program uses container capacity volume.

6. COLLECTIONS			
Question #	Sector	Question/Comment	Response
C2	Service Provider	Would that be possible to give a breakdown of the number of sites of collection sites, how many municipal facilities, bottle depots, non-profit sites make up the total 200 sites to roughly get a sense of the back bone of the system.	The Program does not track collection sites by sector. A list of collection sites is provided in the Program's annual report, which is posted on PCA's website.

C3	Local Government	The tubskids provided for the storage and collection of products are sometimes in poor condition, and can allow the collection of rain to accumulate inside. Can you commit to maintaining the quality and condition of the collection containers provided to collection sites?	The Program works with our collection network and transporters to ensure that collection containers are in good condition. Reusable collection containers are environmentally preferable and cost effective. We also encourage staff at collection sites to use care in handling the containers to avoid damage to them. Any damaged containers are pulled out of service for repair or replacement. All collection sites are requested to report any damaged collection containers to PCA.
C4	Service Provider	Worksafe has inspected our Paint Plus program and insists that we need WHMIS labelling and SDS's for all categories of the program. They do not agree that PCA or the depots are exempt for the waste stream reason; in fact, they are very clear about storage compatibility and WHMIS requirements for the Paint Plus program. Will you be able to provide WHMIS labelling and SDS's for all Product Care Paint Plus depots to be in compliance with Worksafe BC? As you can imagine it is an onerous task to research all product hazards and then produce correct signage at the depot expense.	The Program is in contact with Worksafe BC to discuss the issue and hopefully be able to come to a resolution soon.

6. COLLECTIONS			
Question #	Sector	Question/Comment	Response
C5	Service Provider	Issue: Regulatory Framework. Impact: Lack of clearly defined process within the Regulation to create a framework to engage consistently with collectors regarding program financial management. Outcome: Inconsistent contracting and eroding economics for some stakeholders as handling fees lag inflation; uncertainty for collectors and industry; higher costs for all. Recommendation: Collaborate with progressive collectors and Ministry to define a reasonable backdrop process to resolve disputes that can be embedded in a regulatory amendment.	The Program is not considering any changes to the collection site compensation model at this time. The Program employs a volume-based compensation model that rewards collection sites based on the amount of Program Product collected, which has historically increased year over year. The approach for setting compensation for Program service providers is a business decision addressed outside the scope of the Program Plan.

C6	Indigenous Communities	Identification of collection sites: We are definitely really happy that PCA include first nation collection sites or registered first nation collection sites but it would be great if it was indicate in your documents.	The Program Plan has been amended to reference Indigenous communities collections sites as a separate category.
C7	Local Government	The compensation provided to collection sites is not regularly reviewed to consider rising rent, labour and utility costs. Can you commit to consultation with collection sites on the offered compensation every 3-5 years?	Compensation rates are a business-to-business decision falling outside the scope of the Program Plan. PCA generally uses a volume-based approach to compensate collection sites. The more Program Product collected, the greater the amount of compensation. In general, collection volumes, and hence compensation, have increased year over year.
C8	Local Government	The Plan uses the qualifier “where feasible” for a number of activities and actions that may be undertaken by the program. Recommend the Program identify criteria to define ‘feasibility’ so that stakeholders may make commentary on the reasonableness of the Plan’s approach.	Factors considered in evaluating feasibility of an activity/action include, but are not limited to, economics, level of stakeholder cooperation, timing and a host of other considerations. In each instance, the criteria and thresholds applied will vary depending on the specific activity/action.

6. COLLECTIONS			
Question #	Sector	Question/Comment	Response

C9	Local Government	<p>Compensate collectors. Although some of the programs have achieved stellar recovery rates, many collectors are not compensated for their activities. As a result, recovery of obligated material is likely lower, and there are indications of some collectors transferring materials to other pathways because there is no meaningful benefit for the collector to 'go the extra mile'.</p>	<p>We have no evidence to suggest that Program Products are being diverted to other pathways. Unlike some other stewarded products, paint and HHW products do not have a positive commodity value. In general, the Program employs a volume-based compensation model that rewards collection sites based on the amount of product collected, providing the necessary incentive to ensure all Program Product collected is managed through the Program. The incentive for entities to participate as collection sites is not solely monetary. Collection sites receive additional value-added benefits as a result of increased foot traffic, competitive advantage over other collection sites and enhanced social capital and recognition as a socially responsible member of their community.</p>
C10	Local Government	<p>All EPR programs should develop an arrangement for local governments who receive, or pick-up illegally dumped material, to be paid for managing and handling this material, whether or not the facility is designated as a depot. Local governments, generally, do not seek to compete with private depot operators, yet still receive these materials from residents and businesses. A recommended project for the members of the Stewardship Agencies of BC would be to find out the root causes for consumers to use non-program pathways to discard program material, such as people who dump illegally, who bring materials to transfer stations even when there are permanent depots available, who prefer 'round-up' events to permanent depot locations, and those who 'hide' banned materials in residential loads. Such a study is recommended to include possible solutions to address these issues, such as enhanced collection models that go beyond the drop-off approach (depot model), and financial incentives to encourage product and packaging recovery directly through the EPR programs' collection infrastructure.</p>	<p>The Program has a large volume direct service program for Program Products that is available to private businesses and local government. Illegal dumping is anti-social behaviour that is not limited to program products, and is typically not an issue of accessibility.</p>

6. COLLECTIONS			
Question #	Sector	Question/Comment	Response
C11	Service Provider	Issue: Program Operation: Quality of Transportation Supplies; Servicing Collection Sites. Impact: Poor quality and broken supplies put collectors and public at risk. Outcome: Broken collection boxes can pose risks and cracks allow rain or other fluids to contaminate loads. Recommendation: Invest in improvements to supplies for collectors; create a mechanism for tracking supplies or sites that are aging or damaged.	See response to question C4 above.
C12	Service Provider	Issue: Program Management: Lack of clearly defined process to engage consistently with collectors regarding program financial management. Impact: There is not a mechanism in place to meet & discuss every 3-5 years with collectors regarding fees paid for performing the work. Outcome: Inconsistent contracting and eroding economics for some stakeholders as handling fees lag inflation; impact on quality of service and financial viability. Recommendation: Collaborate with progressive collectors and transporters to create a defined mechanism to review program costs and adjust fees fairly to reflect reasonably operating costs and returns.	All stakeholders, including service providers, have access to PCA during regular business hours via a toll free number or email. See also response to question C7 above.
C13	Local Government	Within the SCRDP, there are four collection sites listed on the Product Care website. However only two are Paint Plus collection sites. Will Product Care be working with existing operators of collection sites to expand to Paint Plus in order to accept the full range of program products?	PCA actively seeks to transition Paint collection sites to PaintPlus collection sites, wherever possible. PaintPlus collection sites must meet stringent regulatory requirements for handling HHW products. Not all collections sites have the capacity or are able to conform to these requirements.
C14	Local Government	How is PCA ensuring adequate compensation to operators of collection sites for the service they provide? E.g. site, staffing, storage, education and promotion	See response to question C7 above. In addition, the Program has an extensive communications and promotions program. Brochures and other education material is available to retailers, collection sites, local governments and others at no charge.

6. COLLECTIONS			
Question #	Sector	Question/Comment	Response
C15	Service Provider	<p>For many depots, it is necessary to pay above minimum wage to compensate for the harder working conditions. In Parksville most employment is in service based industries within non industrial environments. The Product Care Association should take these rising costs into consideration with the consultation process for the stewardship program. Depots should not be expected to carry the full burden of this additional operating costs.</p> <p>There has been no increase in handling fees paid to the depots since 2009. The rate per full tub has remained at \$45.00 since 2003 and the price per litre on the paint exchange portion of the program has remained at \$0.25 since 2003. If the plan is to recycle less than the incentive for the paint exchange should be increased to reflect that goal.</p> <p>Negotiations with other programs has seen an increase in handling fees from 6% to 12% and it is only reasonable to expect that a program that has not increased handling fees in 8 to 14 years should be considering a substantial increase in the handling fees. An increase of 10% would be considered reasonable over the next five years.</p>	See response to question C7 above.
C16	Local Government	Northern BC is under represented with regards to accessibility, with no access to Paint Plus locations north of Terrace in the Regional District of Kitimat-Stikine. Would collaboration on yearly round up events in rural communities be a feasible expectation?	PCA has partnered with other local governments in past with collection events and is open to working with you to explore the feasibility of a collection event. Past experience has shown there is limited success if the event only collects products managed by the program.

6. COLLECTIONS

Question #	Sector	Question/Comment	Response
C17	Local Government	It's uncertain whether residents consider a 30-minute drive to collection facilities to be a reasonable standard. As such, it's difficult to determine whether the proposed 93% accessibility rate based on this standard is an appropriate target. What methodology did Stewardship Agencies of BC use to develop this standard in 2012? Has any research been done to verify that customers are satisfied with this standard, as well as Product Care's collection locations? If this research has not been completed, then City staff respectfully request a commitment in the 2017 plan to undertake a study, including public engagement and user testing, to review the standard from the user's perspective and, if needed, refine the accessibility target.	The standard is utilized by most stewardship programs in BC and by some in other provinces. The standard is intended to set a minimum level. The Program has in some cases gone beyond the standard by establishing collection sites in communities that don't fall within the standard. The program believes that the standard is reasonable.
C18	Local Government	6.3 End of life management, Page 9: "The objective of the Program is to minimize the improper disposal of Program Products...rather than disposing of them improperly in the garbage." Agree that it is preferable to collect program materials for recycling and proper disposal through the existing collection network. Consider expanding the definition of "improper disposal" to include pouring Program Products down the drain into the wastewater and storm water systems. Performance metrics and consumer messaging should be updated to account for a change in scope.	The Program Plan has been amended to include reference to disposal down the drain as an incorrect disposal method. Unlike waste audits, the Program does not see a feasible way of evaluating the amount of material disposed of through the wastewater stream.
C19	Local Government	6.3 End of life management, Page 9: "The Program will report out on the number and location of waste composition audits conducted annually and the amount of Program Product identified, as applicable." Consider adding a performance metric (or perhaps a pilot project to identify suitable performance measures) to determine the presence and/or evaluate the impacts of Program Products on the liquid waste system.	See response to question C18 above.

6. COLLECTIONS			
Question #	Sector	Question/Comment	Response
C20	Local Government	6.3 End of life management, Page 9: “The Program will report out on the number and location of waste composition audits conducted annually and the amount of Program Product identified, as applicable.” Although this may be a good indicator of the effectiveness of the program, Product Care, local governments and other stakeholders must acknowledge the limitations of waste composition studies. For example, year-to-year comparisons and results from multiple jurisdictions should not be used to develop trends, rather they are individual snapshots in time.	PCA acknowledges the limitation of waste composition audits. As noted in the plan, performance cannot be strictly measured by one metric, but rather evaluated through a suite of performance measures and trends.
C21	Local Government	Data Collection. Formalize the collection of data, including options that exist outside of the official EPR collection network. If ‘competing’ collectors do not have an incentive to report data, paying for data or providing an incentive to report should be considered ‘in-scope’ for program obligations. At a minimum, unaccounted-for materials research should be conducted to provide a robust estimate of materials not collected by the program.	The Program only has limited ability to account for management options outside of the program, such as waste audits. In many cases, alternative management for paint and HHW typically resides with private waste management businesses and such data is not readily available or accessible. Unlike other stewarded programs, the products managed under this Program do not have positive commodity value and hence there are minimal alternative management options available to the program.
C22		Just to clarify, CCV is just an absolute number. And it’s the best data available to getting absolute litre number, it doesn’t correlate back to a recovery number based on what’s sold right, it’s just a total collection approximation in litres?	See definition of CCV in section 6.4 of the Program Plan. CCV is not utilized in calculating the recovery rate. The recovery rate is calculated by dividing the volume of residuals collected (RRV) by the volume sold in each year.
C23	Industry	Your presentation and the draft consultation discuss the types of measurement. The draft consultation outlines the CCV but nowhere does it give the RRV (residual recovery volume). Where can we observe the RRV’s for given categories?	Both the CCV and the RRV are reported in the Program's annual report.
6. COLLECTIONS			

Question #	Sector	Question/Comment	Response
C24	Local Government	6.4 Performance Monitoring and reporting commitments, Page 11: “Performance Measures and Targets” Acknowledging the challenges and costs associated with ‘continuous improvement’, the Program is urged be more ambitious in setting targets beyond 1-2% annual increases.	There are many factors that influence the collection rate of Program Products; many of them outside of the control of the Program. These products are consumable and therefore another measure of program performance is the better utilization of the product by consumers, and the reduction of the amount available to collect (see the “B.U.D rule” on page 13 of Program Plan). In addition, reformulation of certain HHW products, in response to consumer demand, may result in a product that is no longer designated. We believe the targets are aspirational and reasonable.
C25	Industry	Table 2: pesticides - As an observation, I wonder if increasing the CCV for pesticides is congruent with market trends. Volumes of poisonous DOMESTIC pesticides are going down not up. How then can there be a 50% increase from 2010? This increase might be consistent with sales if all containers are counted, including those which are not poisonous (and therefore not obligated) since there may be more volume of ready-to-use products sold today rather than concentrates. That said, the RTU products generally are not poisonous and therefore not part of the HHW program. However, if the CCV numbers include all pesticides and not just those designated, then HHW stewards may be paying for non-designated products.	There is not a direct correlation between when a product is sold and when the consumer determines it is no longer of any uses and becomes a waste. There are many factors that influence the rate of return of products. The reported volumes of collected pesticides only include Program pesticides. The Program has taken measures to minimize non program products from entering the collection system. Any incidental non--program products that do manage to enter the collection system are excluded at the point of processing.

7. AWARENESS

Question #	Sector	Question/Comment	Response
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A1	Industry	There aren't enough posters telling people where different products go among all the different stewardship programs. What more are you going to do to promote collection of products on the whole?	The Program makes available at no cost to all retailers, local governments, and collection sites, promotional and educational materials, such as posters to inform consumers. PCA is member of Stewardship Associations of BC (SABC). SABC operates the bcrecycles.ca website that acts as central source of consumer information regarding the majority of the BC stewardship programs. SABC also produces the recycling handbook. The Program's preference is to offer collection at sites that consumers already visit to drop off other products (a "one stop shop").
A2	Service Provider	For the public with questions about recycling vs recovery or incineration, it is really helpful if you can provide product purchase info to help them make choices. I don't mean brands but types of products. Can you provide this info?	Identifying the specific management method for each type of product can be problematic because some products are managed in multiple ways. In addition management options are subject to change, depending on various circumstances such as market conditions.
A3	Local Government	What were the "significant investments in public education and promotion initiatives in 2015" that you undertook? Follow up question: For a program with a 20 year history, a 66% awareness level is not adequate. Your methods for raising consumer awareness are passive (websites, rack cards, RCBC) and have not been updated from the past two program plans. Why have you not committed to the more expensive and aggressive awareness campaigns utilized by other stewardship programs such as television ads, online ads, attendance at community events, summer ambassador programs? If you are doing those things than you could put them in you program plan to commit yourself to continue to do those efforts.	PCA has invested in a range of consumer awareness initiatives, including TV advertising, social media and participation at community outreach events through our Regeneration brand. In general, PCA believes the Program's awareness levels are relatively high when compared with the proportion of the population who actually use the products and the frequency of use. These factors make it difficult to sustain "top-of-mind" awareness in comparison with other products that consumers use on a daily basis. PCA is constantly evaluating and modifying its awareness program.

7. AWARENESS			
Question #	Sector	Question/Comment	Response

A4	Indigenous Communities	I would really like an opportunity to work with you further on the ambassador program to outreach communities who usually don't have access to major services center. I was also happy to hear that you are targeting communities with lower awareness level, I guess you know that with the survey that you have done?	The Program is open to collaborating with various stakeholders to explore opportunities to increase consumer awareness.
A5	Local Government	7. Consumer Awareness, Page 11: All of these methods appear to be worthwhile channels to inform and educate consumers, please consider expanding the messaging to include impacts to the liquid waste system, in addition to the solid waste system.	See response to question C18 above.
A6	Local Government	7. Consumer Awareness, Page 12: "This result may signal that awareness levels for paint and HHW products may be very difficult and costly to move beyond the range of 66%." A single data point does not confirm this conclusion. Several more surveys will be required to determine the validity of this statement.	The Program will continue to perform consumer awareness studies.
A7	Local Government	7. Consumer Awareness, Page 12: "Consumer awareness surveys will be conducted every two years" Is the survey available for review?	The Program reports on consumer awareness levels in its annual report.
A8	Local Government	The proposed awareness target is to maintain between 60%-70% awareness, which allows some slippage from the 2015 rate of 62%. City staff would like to see the wording changed to "achieve 70% awareness by 2021."	While the surveys are all based on statistically significant sampling, there may be variations in the results. The Program Plan sets out the reasons why consumer awareness levels may fluctuate over time and the rationale for providing an upper and lower range. See also response A3.

7. AWARENESS			
Question #	Sector	Question/Comment	Response

A9	Local Government	<p>The Consumer Awareness section of the plan has not been updated from the 2012 version. In addition to the tactics listed (websites, point of sale and return materials, BC recycles handbook, Recycling Council of BC and municipal collection calendars), staff would like to see a commitment to expand outreach to additional engagement activities, many of which Product Care has already undertaken. These could include advertising, social media, earned media, community events and annual participation in a province-wide ambassador program.</p>	<p>The list of communication activities in the Program Plan has been updated to include the full range of potential communication activities that the Program may employ going forward.</p>
A10	Service Provider	<p>Issue: Program Operations: Abandoned Materials. Impact: Consumers who have brought unacceptable or nonprogram materials abandon them at collection sites. Outcome: Depots are bearing an additional operational function and cost for which they are not getting compensated; public education and responsible disposal of abandoned waste. Recommendation: Collaborate with progressive collectors and local governments to better educate public and commercial operators about correct and responsible handling procedures for HHW; work with MOE to look at expanding the scope of the regulation to include other related materials.</p>	<p>Illegal dumping is anti-social behaviour that is not limited to program products. It is a problem that affects all areas of waste management that requires all sectors to work together to try and solve the problem. It is the role of government to develop and enforce by-laws and regulations related to illegal abandonment.</p>
A11	Service Provider	<p>Issue: Consumer and Sector Education: Need for additional Consumer Education. Impact: Consumers don't know enough detail about program operations non-program items; some products not labelled adequately. Outcome: Products are not always properly labelled and thus consumers are not adequately informed about acceptable materials; dumping. Recommendation: Collaborate with progressive collectors and local governments to better educate public and commercial operators about correct and responsible handling procedures for HHW.</p>	<p>The Program is open to collaborating with various stakeholders to explore opportunities to improve consumer education.</p>
<p>7. AWARENESS</p>			

Question #	Sector	Question/Comment	Response
A12	Local Government	How is Product Care Utilizing their communications method as outlined in the stewardship plan to promote and educate residents about how to manage products in a safe manner?	PCA has produced a number of materials, including videos, brochures and online resources informing consumers on how to responsibly manage Program Products at end of life. See section 7 of the plan.
A13	Local Government	Beyond distributing posters and brochures, how is product care working with the operators of collection sites, specifically return to retail/point of sale, to ensure staff awareness of the program, what is/isn't accepted as well as in-store program promotion? It has been noted that sometimes return to retail collection sites do not have signage promoting the program and staff do not know the program details.	The Program makes available at no cost to all retailers, local governments, and collection sites, promotional and educational material, such as posters, to inform consumers. The Program does not have the authority to require retailers to post educational material. The Program does provide collection guidelines to retail collections sites that provide information on collection site operations, product accepted/not accepted and other pertinent information about the Program.

8. MANAGEMENT OF PROGRAM COSTS

Question #	Sector	Question/Comment	Response
M1	Industry	The Program Funding page only referenced PaintRecycle. Did this include HHW as well?	The reference to program funding in the program plan applies to paint, flammable liquids and pesticides. Gasoline utilizes a different funding model.
M2	Service Provider	Issue: Financial Management: Operational Costs and Handling Fees are not aligned. Impact: Depot operators are paying rising costs for leases and taxes and therefore storage space. Outcome: Costs are rising and handling fees are not; Financial viability and return on product is deteriorating. Recommendation : Increase handling fees to account for inflationary pressure on base operating costs	A viable collection system is fundamentally important to the Program. PCA generally uses a volume-based approach to compensate collection sites. The more Program Product collected, the greater the amount of compensation. In general, collection volumes, and hence compensation, increase year over year. Compensation rates are a business decision outside the scope of the Program Plan. The Program considers that it adequately provides for the costs

			of collecting and managing Products within the product category covered by the Plan as evidenced by the level of
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8. MANAGEMENT OF PROGRAM COSTS

Question #	Sector	Question/Comment	Response
			participation by collection sites and the associated accessibility level.
M3	Service Provider	How are questions related to program management and collection costs best presented? Is there a process for stakeholders to comment on financial issues?	Stakeholders that have questions/comments regarding program management and collection costs can direct their concerns to PCA directly.

9. MANAGEMENT OF ENVIRONMENTAL IMPACTS

Question #	Sector	Question/Comment	Response
E1	Service Provider	Has Paint Exchange has been renamed as Paint Reuse?	Last year, the Paint Exchange program went through a rebranding process and we renamed it the Paint ReUse. The intention is to have a name that better reflects the purpose of the program which is to have the consumers pick up leftover paint at a collection site at no cost and use the paint.

E2	Local Government	To compliment regional and municipal zero waste goals, City staff encourage Product Care to include in the plan a long term goal of zero paint and HHW -related waste to landfills and incinerators. To this end, it's recommended that Product Care include an action in the plan to complete a study on how to measure performance towards zero waste to disposal facilities, and develop interim disposal reduction targets.	The purpose of the program is to minimize the amount of product left over by consumers, and collect as much of the unwanted products as possible to keep them out of landfills and waterways. We do not consider that a separate target or study relating to disposal facilities will be useful.
E3	Regional District	Page 16 table 4: The way it is laid out is confusing. Containers at top and bottom is confusing. I was not processing it. Maybe a simpler way to present the information.	The table has been modified to make the presentation of the information clearer.

GENERAL			
Question #	Sector	Question/Comment	Response
G1	Indigenous Communities	I really appreciate the PCA administration of this program. I had the pleasure to take 6 of our first nation people to your new Delta plant as part of the Swana level 2 training. The new plant is very impressive, everything is done in an environmental manner, so congratulation on that.	Thank you for the positive feedback.
G2	Regional District	The Program has been highly effective at collecting and managing residual paint and household hazardous wastes in BC. The Program should also be commended for two initiatives: - The Paint Exchange program which gives away reusable paint, at no charge. - The B.U.D. promotion, which encourages consumers to avoid waste by only buying what they can use.	Thank you for the positive feedback. PCA strives to operate effective and efficient programs.

G3	Industry	<p>Generally cleaning up wording in the document: As this document will be the “go to” document to determine what is in and what is out, for communications on the website and as reference materials for many stakeholders, our members suggest additional cleanup and clarifications are needed. In addition to definitions, members point out examples such as: if quoting the BC Regulations, quote all of the relevant regulations; otherwise, readers may be confused; if explaining something such as what paints are not included as paint, but may be as pesticides, this needs to be clear and unambiguous</p>	<p>The Program Plan has been reviewed in light of this comment to ensure information presented is clear and complete.</p>
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