

Draft Plan for Consultation

BC Portable And Floor Care Appliance Stewardship Plan

for the period July 1, 2010-June 30, 2015
on behalf of the
Canadian Electrical Stewardship Association

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Executive Summary

This draft stewardship plan for **portable and floor care appliances** in BC has been prepared pursuant to the requirements of the BC Recycling Regulation. This preliminary program plan will be used in consulting with stakeholders. The plan will be revised following the consultation process. Consultation and meeting information is available at ProductCare.org/Consultations.

The Canadian Electrical Stewardship Association (CESA) has been created to implement and manage the plan. The program will be funded by eco-fees remitted to the association by its members based on product category and sales in BC.

CESA will establish and operate a collection system across BC to collect the end-of-life program products. Collected program products will be consolidated and transported to facilities for recycling and other management options. The program will include measures for environmental risk reduction.

The program plan includes a communication and education program to ensure public awareness of the program, drop off site locations, as well as proper handling of program products.

This is a five-year plan covering the period July 1, 2010 to June 30, 2015, and includes performance targets and measures.

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Draft

1. Introduction – Background and Consultation Process

This draft stewardship plan for **portable and floor care appliances** in BC has been developed by the Canadian Electrical Stewardship Association (CESA) with input from the Canadian Appliance Manufacturers Association (CAMA) (an industry council of Electro Federation of Canada), the Association of Home Appliance Manufacturers (AHAM) and the Canadian Hardware and Housewares Manufacturers Association (CHHMA) with the assistance of the Product Care Association. The program plan has been developed pursuant to the requirements of the BC Recycling Regulation, B.C. Reg. 449/2004 (the “Regulation”).

This plan will cover the 5-year period **July 1, 2010 to June 30, 2015**. Consultation on the plan will be conducted in October 2009 and the final plan will be submitted to the BC Ministry of Environment for approval before January 1, 2010.

This preliminary program plan will be used in consulting with stakeholders. The plan will be revised following the consultation process. Consultation and meeting information is available at ProductCare.org/Consultations.

Following submission of the program plan to the BC Ministry of the Environment, program plan implementation will begin, including:

- identification and qualification of collection sites, transporters and processors
- creation of the communication strategy
- registration of producers
- budget development, cost analysis and fee setting

It should be acknowledged that although CESA is committed to implementing this stewardship plan in a timely fashion, a full collection network will take time to build, as there are no precedents for collection of these products in a program within Canada.

2. The Stewardship Agency

The Canadian Electrical Stewardship Association (CESA) is a national not for profit corporation created for the purpose of operating extended producer responsibility programs for portable and floor care appliances in Canada. A board of directors selected by the fee-paying producers will govern CESA.

CESA is responsible for overseeing the Program Plan on behalf of its members who are the producers. As defined in the BC Recycling Regulation Guide, “the product producer is principally the first-seller of the product in the province. In practice the producer is typically the product manufacturer, distributor or brand-owner. The producer could also be an importer, broker or retailer who sells the product directly to a consumer.”

The founding members of CESA are listed in Appendix A. Each of the Program's members will appoint CESA as their proposed stewardship agency and its authorized agent as described in section 2(2) of the Regulation.¹

3. Products included in Plan

This plan is intended to capture **portable electrical appliances**, powered by 120V 60 Hz input power or batteries, **designed for use in homes** in the following categories:

Countertop Cooking Appliances—Electrical portable appliances for food preparation that may include heating elements or motors. This includes products such as electric knives, food sealing equipment, toasters, blenders, slow cookers, coffee makers and countertop microwaves.

Garment Care Appliances—Electrical appliances used for smoothing wrinkles from fabrics or for garment care. Includes both irons and garment steamers.

Floor Care Appliances—Electrical portable appliances and their accessories that are used for dry or wet cleaning of floor and upholstery surfaces. Includes vacuum cleaners, floor steamer and carpet cleaners.

Air Treatment Appliances—Electrical portable appliances used for space conditioning. Include portable heaters, fans, humidifiers, and air cleaners.

Personal Care Appliances—Electrical portable appliances used for personal grooming or hygiene. Includes such products as shavers, hair clippers, hair dryers, curling irons, massagers, and electric toothbrushes.

Time Measurement Appliances—Electrical portable appliances used solely for measuring or displaying time. Includes clocks and timers.

Weight Measurement Appliances—Electrical portable appliances used for measuring weight. Includes such things as body scales and countertop food scales.

Batteries—where products contain primary or rechargeable batteries, they should be removed from the products in accordance with the manufacturer's instructions and disposed of according to the requirements of the British Columbia Ministry of Environment and the Rechargeable Battery Recycling Corporation battery stewardship program.

¹ British Columbia Ministry of Environment (2006). *BC Recycling Regulation*. Accessed at http://www.bclaws.ca/Recon/document/freeside/-- E --/Environmental Management Act_SBC 2003_c. 53/05_Regulations/43_449_2004_Recycling_Regulation/449_2004.xml

Other accessories sold with household appliances will be accepted as part of the Program. Future appliances that fit within the above categories will be included in this plan.

Appliances designed for industrial or commercial purposes are not included in this program. Appliances that do not require electric power are not included in this program.

The Program includes both products clearly attributable to an existing producer, and orphan products. Orphan products (those that are no longer in production or which the manufacturer is no longer producing) will be accepted by the program if their function was the same as products in the program.

Details on product definitions and examples are included in Appendix B.

4. Current Market and End of Life Management

4.1 Sales & Market

Members of the Canadian Appliance Manufacturers Association (CAMA), the Association of Home Appliance Manufacturers (AHAM), Canadian Hardware and Housewares Manufacturers Association (CHHMA), and the Retail Council of Canada (RCC) manufacture and/or import program products for the North American market. As the products require electricity, those with an attachment plug are designed specifically to meet the North American voltage requirements. There may be some products that are made for a worldwide market if they use batteries as the sole energy source. The products are distributed through retail stores, direct sales, the Internet, television sales, and infomercials.

The portable and floor care product categories are stable and viewed by consumers as replacement or commodity products. In these cases, when a coffee maker reaches end of life, the consumer generally replaces this with another coffee maker. However, there are a number of products that have a relatively short (5-7 year) cycle in which the product sees a significant rise to meet high interest level and then afterward shipments are more modest.

The recent economic downturn has had and will continue to have an impact in the near term. This has resulted in a decrease in the number of manufacturers, lower sales as consumers use their program products for a longer time and less funding for research and development in product design. These trends make forecasting future sales difficult.

In addition, shipment statistics for individual product categories in the portable and floor care categories in Canada are not available. Estimates for shipments in Canada are given by several sources. Currently, there are no specific shipment statistics for British Columbia. The estimates given in Table 1 are based on Canada

shipments and the annual percentage of population of Canada in BC. For many new categories, there are no statistics available.

Table 1 Estimated Shipments to BC of Portable and Floor Care Appliances from 2005 to 2008

	Units in 2005	Units in 2006	Units in 2007	Units in 2008
Personal Care Electrics				
Shavers	115703	119197	137183	149253
Curling Irons/Brushes	179607	173389	220305	219605
Hair Dryers	154228	157627	187972	195672
Men's Trimmers	89673	89235	121606	155828
Home Hair Clippers	54012	58622	65974	80873
Toothbrushes	249758	242823	NA	NA
Kitchen Electrics				
Coffee Machines	211884	222241	276854	285224
Blenders	103339	118155	156556	171608
Mixers (Hand and Stand)	62212	71127	91761	99151
Irons & Garment Steamers	101257	99917	126188	136892
Toasters	144727	146684	175275	191859
Kettles	147330	155412	184307	200012
Grills & Griddles	66767	62139	80896	86790
Toaster Ovens	73274	84545	95295	93365
Food Processors	58177	83633	81158	96653
Slow Cookers	NA	70476	108123	134130
Deep Fryers	46203	46637	47386	52732
Food Steamers & Rice Cookers	26290	26445	49088	66671
Citrus Juicers	5076	3908	2618	8548
Juice Extractors	8199	7816	11388	13939
Waffle Irons & Sandwich Makers	34229	32437	28929	31955
Coffee Grinders	43861	42598	56680	61937
Bread Makers	8199	12506	16101	14597
Can Openers	35401	37909	35212	31692
Skillets & Woks	23817	23579	26573	26695
Microwave Ovens (Includes both Countertop and OTR)	116745	120891	148572	147806
Air Treatment				
Fans**	66116	126232	138361	239,540
Heaters	NA	NA	122953	122953
Humidifiers	NA	NA	124005	124005
Air Cleaners	38134	39342	40710	41686
Vacuum Cleaners				
Full Size Vacuums	108025	119327	181166	184626

Hand and Stick Vacs	107764	104086	104589	121375
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**Based on Imports to Canada

4.2 Available for collection

The amount available for collection in a given year depends on the life expectancy of the product and the number of units sold in the previous years that may now be reaching the end of their useful lives. The table below shows the range of lifespans of the products and the average. It should be noted that the life expectancy of most products is based on hours of use (often determined by the motors within appliances) and as a result, the number of years that a product lasts may vary greatly based on the frequency with which its owner uses it.

Table 2 Life Expectancy of Selected Portable & Floor Care Appliances²

	Low	High	Average
Coffeemaker, Drip	4	10	7
Coffeemaker, Percolator	4	8	6
Griddle (Electric Fry Pan)	5	10	8
Deep Fryer	6	12	9
Toaster	3	9	6
Toaster Oven	3	9	6
Food Processor	4	10	7
Blender	4	10	7
Stand or Hand Mixer	4	12	8
Iron	3	9	6
Hair Trimmers	2	6	4
Carpet Shampooer/Steam Cleaner	5	12	8
Vacuum (canister, stick, upright, handheld) ³	6	12	9
Microwave Oven	13	15	14

² 27th Annual Portrait of the US Appliance Industry, September 2004 as noted in Beck, 2005.

³ Some models of vacuum cleaners have been demonstrated to have life spans in excess of 12 years.

Figure 1 Projections of Material Quantities Generated by Discarded PFC Appliances -Canada⁴

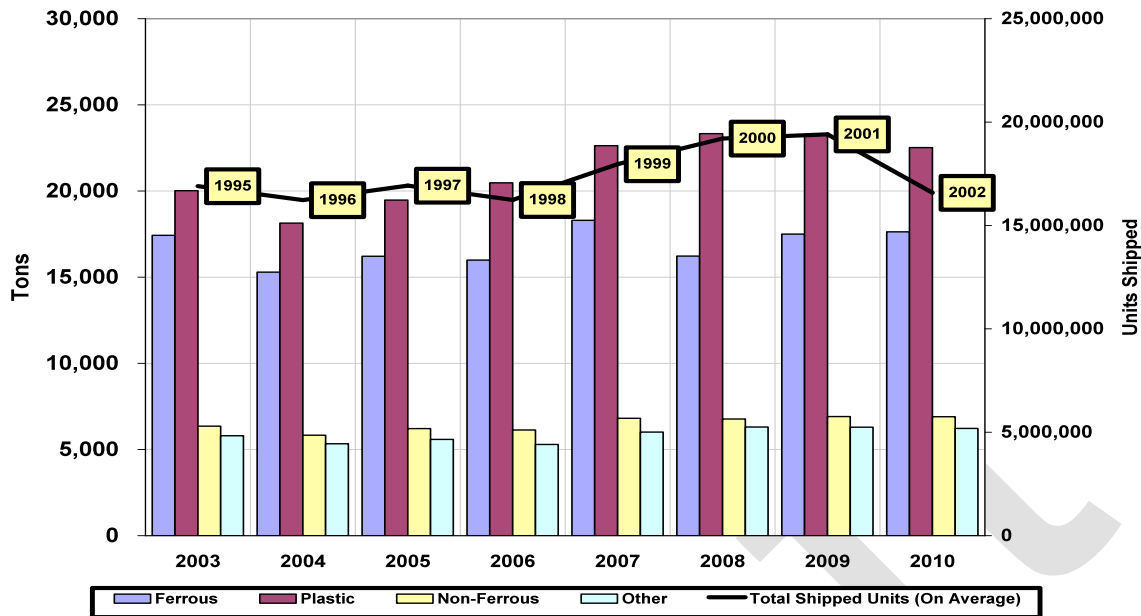


Table 3 Estimated Tonnes of Material Resulting from Portable or Floor Care Appliances Discarded in 2005 -British Columbia⁵

Category	Average Age	Ferrous	Non-Ferrous	Plastic	Other	Total
Beverage	6.5	105	92	313	90	600
Countertop Cooking	6	775	186	474	129	1563
Kitchen Motorized	7	220	173	242	214	849
Microwaves *	13.99	1762	188	241	167	2358
Garment Care	6	35	59	80	11	185
Home Comfort	12.5	262	60	290	73	685
Personal Care	4	82	22	135	62	300
Floor Care	9	375	119	692	61	1246
Total		3615	898	2468	806	7786

*Includes both countertop and built-in microwaves

⁴ Beck, R.W. (2005). *Recycling, Waste Stream Management, and Material Composition of Portable and Floor Care Appliances*. Prepared for the Association of Home Appliance Manufacturers.

⁵ Extrapolated from Beck, R.W. (2005). *Recycling, Waste Stream Management, and Material Composition of Portable and Floor Care Appliances*. Prepared for the Association of Home Appliance Manufacturers.

These numbers provide an approximation of quantities of the different types of materials available for collection and will be used as a guideline. The numbers are based on the best available data which uses the assumption that product composition has remained stable over time. For some categories such as time and weight measurement devices, there is no data available. After the program begins, improved sales data will be available, and further research will be undertaken to improve the method of estimating the amounts available for collection.

To illustrate the scale of the program, in 2003 there was over five times as much electronics equipment available for recycling as portable and floor care appliances.⁶

4.3 Collection

A study commissioned by the Association of Home Appliance Manufacturers⁷ noted that in Canada and the US, most end of life appliances went into the solid waste stream, with a small portion going to government sponsored recycling programs, scrap metal recyclers or electronics recycling programs (if mixed with those products). This is the case in BC, with a few exceptions.

In BC, there are recycling companies (i.e. Happy Stan's Recycling, Pacific Mobile Depots), non-profit recycling agencies (i.e. Nanaimo Recycling Exchange) and some local government facilities (i.e. Nanaimo Landfill) that will take back appliances. Most of these organizations send the end-of-life appliances to a metal recycler where the items are shredded and the metal is recycled. At some companies, there may be charges and restrictions on the types of appliances accepted.

The Regional District websites that direct consumers to drop-off locations for small appliances (such as Metro Vancouver or the Regional District of Nanaimo) provide different locations for items that are still usable and non-functioning end-of-life appliances. Items that can still be used are directed to thrift or second-hand shops and charities while the end-of-life products are directed to recycling organizations. Metro Vancouver prohibited from landfill all items listed in Schedule 3 of the BC Recycling Regulation in April 2009⁸.

There is one retail chain, London Drugs, which has been successfully accepting back some small appliances for over a year and a half. Customers bring in end-of-life appliances that they had purchased at London Drugs or appliances bought elsewhere when they buy a replacement item. The company consolidates the items at their warehouse and has them processed into their component parts for recycling.⁹

⁶ Ibid.

⁷ Ibid.

⁸ Metro Vancouver Waste Management Committee minutes from April 8, 2009 meeting package.

⁹ London Drugs <http://www.greendeal.ca>

4.4 Processing

Most personal and floor care appliances that are recycled are captured through scrap metal recyclers and tend to have higher metal content. These appliances usually are shredded into their component materials. There are a few exceptions (for example, Genesis Recycling) where the appliances are disassembled, allowing for better sorting of the materials and thus more complete recycling.

The metals are consolidated by the larger recycling firms and sent for smelting (usually in the Western US) after which the metals are sold back into the market. Some plastic may be included with the metals as contamination (particularly if the appliances have been shredded), lowering the price of the material and being consumed in the smelting process. Plastics and glass that have been sorted are sold into recycling markets where possible.

5. Planned Operations

5.1 Collection System

Collection Locations

The Program will establish a system of permanent year-round collection locations in British Columbia aimed at collecting intact program products. There will be no charge to drop off program products. The Program will not directly own or manage any depots but will contract with willing organizations that view this as an opportunity. Collection sites may be located at facilities such as retailers, recycling organizations (both non-profit and for profit), local government recycling centres or transfer stations or at other associations or businesses. The program will work to incorporate existing retailer return programs.

The intent is to establish a province-wide network of sites that provides reasonable access to consumers. Actual depot locations will be determined through the implementation process based on facilities available, ability to meet standards (see Appendix C for more details), proximity to population, ease of access and cost effectiveness. Where necessary, the Program will supplement the depot collection system with a number of one-day events in areas where there are no collection sites, possibly in participation with a retailer, or municipality or regional district.

Collection Containers and Transportation

It is the intention of the Program to contract out for the services of transportation from collection sites to processors (possibly employing consolidation points). Program products will be collected and transported using collection containers that fulfil environmental, safety and transportation requirements. Collection container options will be reviewed in consultation with potential collection sites and transporters.

Collection and Transportation Standards

Standards for collection sites and transportation services will be developed (see Appendix C for details) and adherence to the standards will be required of all collection sites.

5.2 Processing and Tracking

The Program intends to negotiate contracts for the processing of portable and floor care appliances and will consider available service providers based on a number of factors including location, capacity, processing methods, downstream vendors and conformity with processor standards (see Appendix C for details). A tracking system will be developed to track the portable and floor care appliances from the point of collection to final destination. Audits will be performed to ensure compliance by processors with processor standards.

CESA will continue to work to differentiate products with higher recyclable content and establish mechanisms to account for these differences.

5.3 Product Life Cycle and the Pollution Prevention Hierarchy

Reduce

The environmental impact of the program products can be reduced in three ways: reducing toxic components, reducing the materials used in the manufacture and use of the products, and increasing energy efficiency. Producers have been working on all of them. For example, over the past five years, manufacturers have been working to discontinue the use of brominated fire retardants in the plastics and this work continues. Making products lighter to reduce the transportation requirements has been an ongoing consideration in product design resulting in a higher percentage of plastic in some products. Also, plastic can last longer in some situations (i.e. where metal may corrode). Future improvement can be expected in energy efficiency as producers focus on reducing overall energy and standby power consumption.

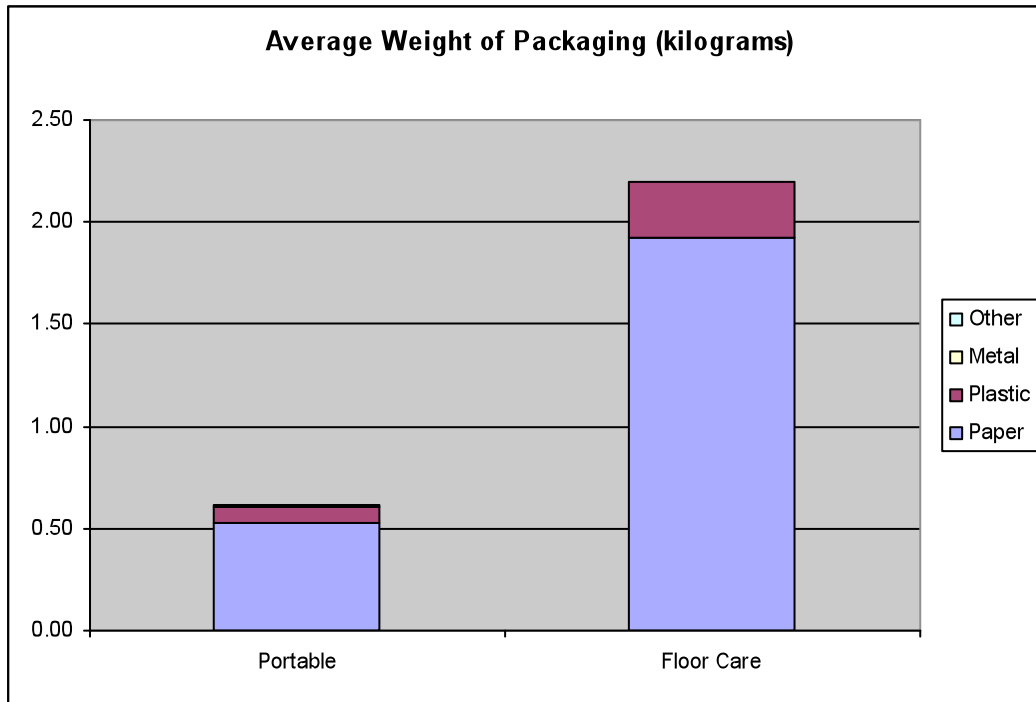
It should be noted that the program products do not contain any refrigerants and thereby require no special considerations for handling.

Redesign/Eliminate

Packaging is another area where producers have been making changes. The use of styrene products has been decreased in favour of more easily recycled options such as soft chipboard or plastics 1 & 2.¹⁰ Packaging materials were analyzed in Beck's report with the results shown in Figure 2 below. This data is from 2005 and further progress has occurred since then.

¹⁰ Personal communication with Wayne Morris, AHAM

Figure 2 Materials in Portable and Floor Care Appliance Packaging by Weight (2005)¹¹



Every year, manufacturers continue to review design of products for sustainability and impact on the environment.

Reuse

While reuse and repair of the program products are worthy goals, there are several considerations that make it impractical to include it in the program. First, in Canada, there are requirements for mandatory safety testing under programs such as the Canadian Standards Association (CSA) or Underwriters Laboratories of Canada (ULC). Manufacturers are responsible for the safety of all products with safety certification. Outside of licensed and authorized service facilities, manufacturers could not guarantee the safety of the product after it has reached end of life. In addition, manufacturers may have warranty restrictions on the sale of used products. Finally, there are health risks with program products that come in contact with the body (for example, electric shavers) or food (for example, meat grinders) where sanitation cannot be guaranteed. For these reasons, this program will focus on the proper recycling and recovery of end-of-life products. The Plan recognizes that consumers give properly working appliances to friends and family as well as to charitable organizations. As long as the product is in good working order, such reuse can exist.

¹¹ Beck, R.W. (2005). *Recycling, Waste Stream Management, and Material Composition of Portable and Floor Care Appliances*. Prepared for the Association of Home Appliance Manufacturers.

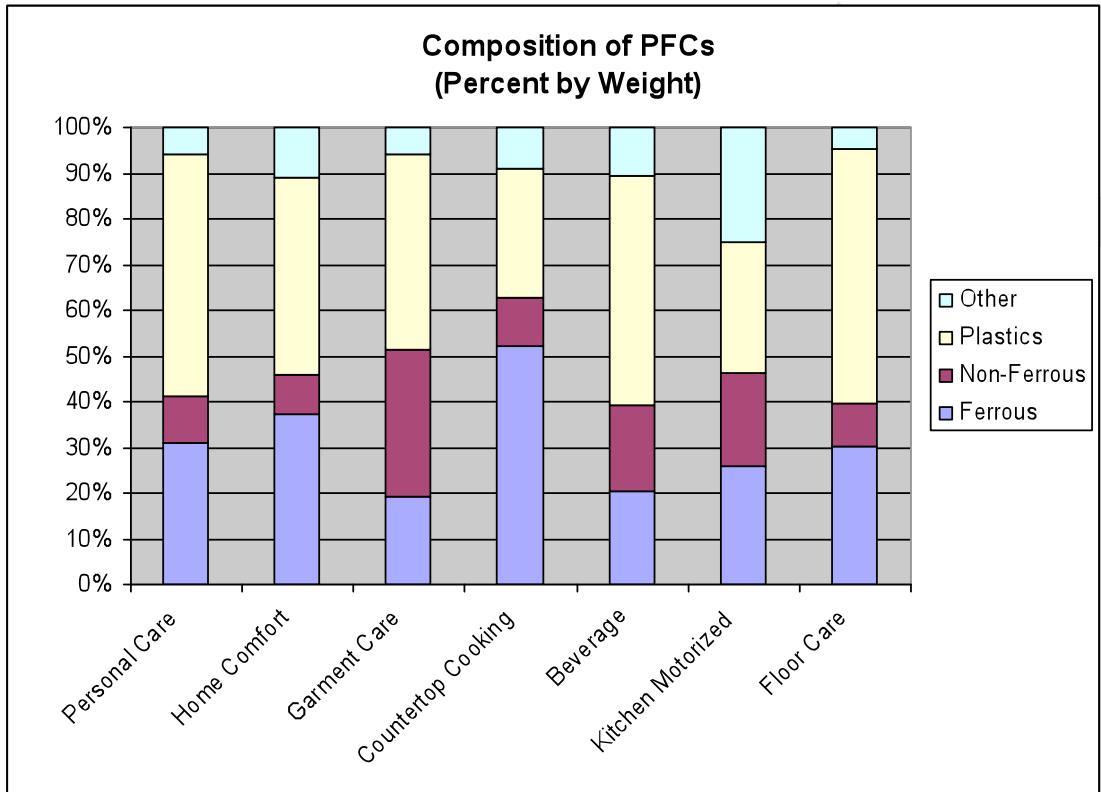
Repair

Manufacturers encourage the use of proper repair facilities prior to designating an appliance as reaching end of life. Proper maintenance and repair can increase the life of a product and is to be encouraged.

Recycle/Recover

The materials that make up the PFC appliances vary by the type of appliance as shown in Figure 3 below.

Figure 3 Compositions of Portable and Floor Care Appliances¹²



Further details on the types of plastics in various product types are characterized in Figure 4. One challenge for recycling is the variety of plastic types used. Beck¹³ noted that some have higher amount of ABS while others use more polypropylene. There can also be engineered plastics, PVC, polystyrene and HIPS polymers polycarbonate, foam insulation –polyurethane and other plastics. In addition, as advances have been made in electronics recycling, more processors have been sorting the plastics and recycling them.¹⁴ While metals are easier to recycle, their

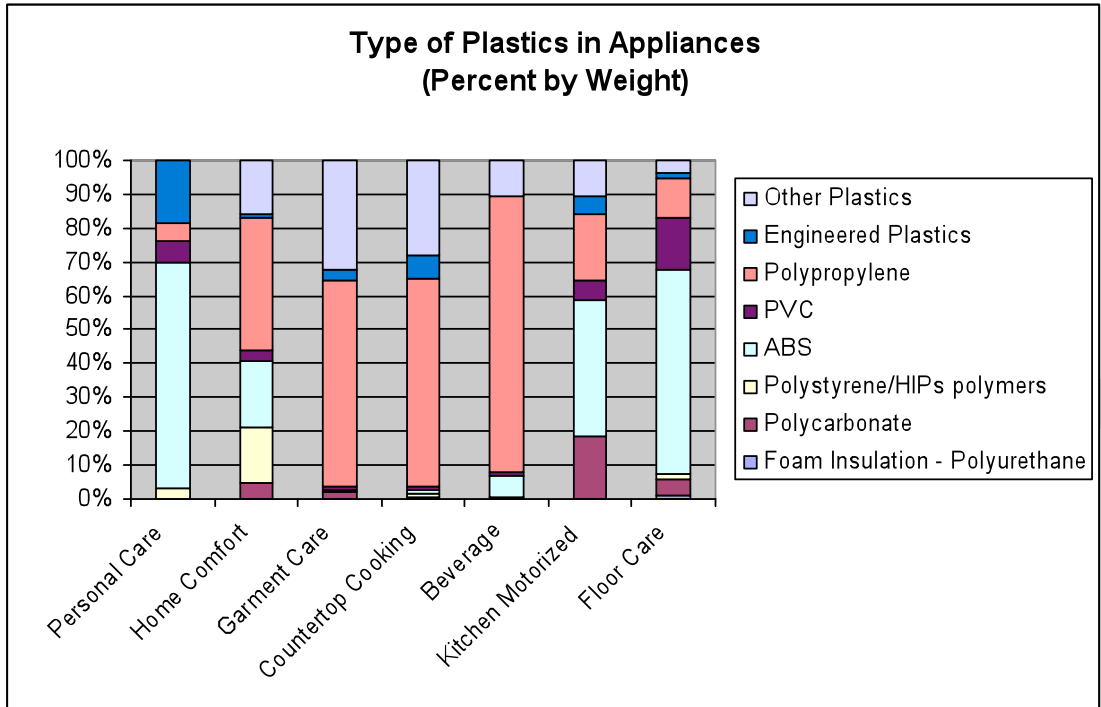
¹² Beck, R.W. (2005). *Recycling, Waste Stream Management, and Material Composition of Portable and Floor Care Appliances*. Prepared for the Association of Home Appliance Manufacturers.

¹³ *ibid*

¹⁴ *ibid*

use over plastic needs to be balanced against other considerations such as fuel required to transport heavier appliances, safety concerns with insulation against electric shock and a potentially shorter lifespan where corrosion is an issue.

Figure 4 Types of Plastics in Appliances¹⁵



As a new program, many details remain unknown. AHAM has already provided some information with the research it commissioned to establish data on amounts of materials available from different small appliances and considerations when implementing a take back program. However, more information is needed. Research could look into actual practices in small appliance recycling, or sorting of materials.

GHG Impact of Recycling

When the materials are recycled, they reduce the need for virgin resources to be used. As these virgin resources take more energy to produce than using recycled materials, Greenhouse Gases (GHGs) are saved through recycling. The Environment Canada model shows the following GHG savings per tonne of material.

¹⁵ Beck, R.W. (2005). *Recycling, Waste Stream Management, and Material Composition of Portable and Floor Care Appliances*. Prepared for the Association of Home Appliance Manufacturers.

Table 4 Carbon Dioxide Equivalents Reduced through Recycling of Materials¹⁶

Material	Tonnes eCO₂ per tonne recycled
HDPE	-2.27
PET	-3.63
Other plastics	-1.80
Aluminum	-9.65
Steel	-1.18
Copper Wire	-4.10
Glass	-0.10
Microwaves	-1.26

5.4 Consumer Awareness

The Regulation requires that the plan makes adequate provision for informing consumers of the producer's product stewardship program, the location of collection facilities, how to manage products in a safe manner as well as the environmental and economic benefits of participating in the program. The Program will develop a communication strategy to educate consumers about the program. The strategy will be modified over time in response to the results of the market research study, focus groups, community-based social marketing pilot projects, consumer awareness surveys, performance measures and work with willing partners to raise awareness.

Focus groups

CESA will conduct focus groups of typical consumers to identify the barriers and benefits of participating in the program. This information will then be used to develop some of the market research study questions and to develop pilot projects using community-based social marketing methods. Focus groups could also be used to fine tune key messages and for further research in the pilot projects.

Market Research Study

The Program will conduct a consumer market research survey to determine the level of awareness of existing programs, the need to dispose of appliances responsibly, key messages and methods to raise consumer awareness of the program and will also be used to gather other information that may assist the program.

Consumer Awareness Surveys

The Program will conduct ongoing consumer surveys to determine consumer awareness of the program (see section 6.2 in Performance Measures) and to gather other information that may assist the program. The survey may include questions regarding:

- awareness of the program and methods utilized by consumer to obtain program information.

¹⁶ Waste GHG Calculator available through Environment Canada.

- awareness of and satisfaction with the collection system including desirable depot characteristics
- identification of target audiences, key messages and information channels for the Program's communication program
- quantity of used small appliances in respondent's household, and intentions regarding use or disposal.

Key Messages

For used small appliances, it is important that consumers are aware of the importance of returning them, where to return them and the appropriate way to handle them.

Specific information will be provided on:

- The particular products included in the program
- Hazards associated with re-selling used electrical appliances
- Collection sites and handling the products
- What happens to the collected products and where the materials go
- The fees and how they are used

Methods

The Program will use a number of methods of creating consumer awareness of the program including the location of the collection sites, and information regarding product handling. These include:

- Website - This will have information on what items can be returned and where. A Google Map based depot finder will be available. It will also include a print-ready brochure (in pdf format) and an ordering system for organizations that wish to request print media to assist in informing consumers. Links to other organizations such as recycling organizations will be made for users looking for recycling information.
- Recycling Hotline 1 800 667 4321 or 604 RECYCLE– The Program will participate in the RCBC recycling hotline service by which consumers can contact RCBC operators during business hours and obtain information about disposing of the Program products as well as any other products.
- RCBC Recyclepedia – provide RCBC with updated lists of collection sites for inclusion in their online search system providing consumers with information on where to take back different products.
- Point of Return – all participating collection depots will be provided with program signage to display and counter cards to distribute to consumers.
- Yellow Pages – an advertisement will be placed in every Yellow Pages publication in the province.
- Annual report – the report will be posted on the website once approved by the Ministry of Environment for interested parties to read. The report will include

details for consumers on the environmental and economic benefits of returning portable and floor care appliances.

- Earned media & advertising
- Launch (plan for announcements/media/opening, etc)
- Other avenues identified through the market research study, focus groups and communication plan development

Partnerships

The Program would also like to partner with organizations that already communicate with consumers about product return. The communications generated through these collaborations will be determined through discussions with potential partners. Some possible avenues are:

- Point of sale –These could include shelf-talkers, counter cards, consumer brochures, program posters, at no cost to the retailers. These will be re-evaluated for design and distributed to participating retailers at least every two years, and “refill” orders are distributed to retailers upon request at any time, at no cost.
- Retail electronic, and pre-print communications - Leveraging of existing ongoing consumer based marketing and advertising.
- Municipal & Regional District partnerships – The Program will participate in municipal calendars by advertising program information. CESA would like to participate in community recycling events and promotions and will seek opportunities to partner with local governments to inform householders of the availability of the program. In addition, the Program would work with partners to have links to the Program website. The Program may also offer brochures at no cost to local governments for distribution with their mailings if the research shows this to be effective.
- Others –Brand owners and other agencies with an interest in recycling may wish to have links to the Program website. In addition, LiveSmart BC, the BC Provincial government program to encourage more sustainable habits among BC residents, could be another partner to ensure that consumers using small appliances know where to return them. Sponsorship of provincial recycling conferences may also be pursued.

5.5 Administration

Fees and Budgeting

The Program will be managed and funded by members of the Program through fees levied on the sale of new portable and floor care appliances into the BC residential market. Producers will be obligated to pay the fees starting July 1, 2010. Producers joining the program after July 1, 2010 will be required to pay retroactive fees and accrued interest. Fees may be passed on by the producers to their customers at their discretion as visible fees or part of the product cost. The fees will be set using estimates for program costs, projected life, and product sales units. Costs associated with managing obsolete or orphan products will be applied to the successive product technology under the Program. Activities in advance of fee collection (such as developing the plan, establishing the collection network, assessing qualified processors and developing the communication strategy) will be reimbursed from future program revenues, with interest. Fees will be subject to Harmonized Sales Tax (HST) which is being introduced to British Columbia on July 1, 2010.

Level Playing Field

In order to maintain a 'level playing field' for the Program members and to ensure that all obligated producers of the program products are in compliance with the Regulation, the Program will conduct a continuous market surveillance and producer recruitment effort. The Program will actively research, identify and recruit producers of program products.

Techniques to identify potential producers will include internet searches, store visits, information obtained through producer compliance reviews conducted by the Program, through audits of collected materials and by information received from existing members. Once a potential producer is identified, the following is the compliance process protocol to be followed by the Program in recruiting producers of such products:

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

Risk Management and Reserve Fund

The Program will reduce the risk arising from product management using a number of methods including:

- Developing, implementing and auditing collection, transporter and processor standards (including operating procedures and control systems) as part of responsible environmental management practices.
- Maintaining adequate insurance to cover liabilities, environmental or other, including directors and officers liability insurance.
- Maintaining a reserve fund. The Program proposes to accrue a reserve fund which is limited to the amount determined by the Board. The reserve fund serves a number of purposes. The primary purpose is as a reserve in case of environmental claims. The fund also allows for stability of program funding in case of volume increases, fluctuations in operational costs or reduced revenue.

Dispute Resolution

Contractors: The Program will contract with all suppliers and service providers to the program by the use of commercial agreements.

- Program Manager: CESA will contract to engage the services of a program manager for the program.
- Collection depots: All collection depots will be contracted to the program using renewable agreements which provide for a cancellation by either party on 30 days notice.
- Processing: CESA will contract with reputable downstream processors and will ensure compliance with the vendor standards.

Any disputes arising from collection or processing contracts would be resolved using normal commercial legal procedures.

Other stakeholders: Any complaints received from the general public or other stakeholders will be first dealt with by the program manager. If the issue remains unresolved, the matter would be referred to the CESA Board of Directors. Any consumer enquiries that cannot be answered by the retailer or collection depot will be referred to the program manager who will resolve the enquiry directly with the consumer.

6. Strategies & Actions

In this section the strategies and actions for implementing the program and improving program performance are set out. As this is a new program with few precedents, strategies and actions have been listed for the first two years with the expectation that future actions will be determined by the experience and needs identified during the actual operation of the program. The potential strategies and actions for later years are listed for information purposes only.

6.1 Collection

Vision	To optimize collection of available products through a network of accessible, well-run collection sites
	<u>Actions</u>
year 1	<ul style="list-style-type: none"> • Increase size of collection network, establish event days in underserved communities
year 2	<ul style="list-style-type: none"> • Increase size of collection network, establish event days in underserved communities
Possible actions for later years	<ul style="list-style-type: none"> • Increase size of collection network, re-evaluate business proposal if more collection sites are needed (niche areas) • Conduct collection site user satisfaction survey and create action plan • Audit existing collection sites for compliance to standards • Implement action plan to improve customer satisfaction • Work with waste hauling companies to educate their customers on the program • Work with local government to get their feedback on program and address issues • Conduct collection site operator satisfaction survey and address any issues • Work with willing partner communities on enacting landfill bans (assuming adequate collection facilities) • Assess rate of collection, determine barriers that still exist and develop plan to capture remaining amount

6.2 Awareness

Vision	To have all consumers of the products aware of the program, where to find depot location information and how to safely handle the product
	<ul style="list-style-type: none"> • <u>Actions</u>
year 1	<ul style="list-style-type: none"> • Conduct focus groups • Conduct market research study • Develop & implement the communication strategy • Design the communications elements • Establish the program with launch-specific communication • Conduct a consumer awareness survey at the end of the first year
year 2	<ul style="list-style-type: none"> • Modify communication strategy based on experience and survey results • Work with potential partners • Conduct community based social marketing pilot projects
Possible actions for later years	<ul style="list-style-type: none"> • Consumer awareness surveys will be conducted in years 3 and 5 • Use results to modify communication strategy • Roll out successful pilot programs to the broader community and continue testing new ones

	<ul style="list-style-type: none"> • Further pilot projects and sharing results with public and partners
--	---

6.3 Environmental Aspects

Vision	To decrease the environmental impact of the products through product design, collection and recycling of the product and program efficiency
	<u>Actions</u>
year 1	<ul style="list-style-type: none"> • Develop metrics and baseline data for impacts of program
year 2	<ul style="list-style-type: none"> • Analyse end markets of materials and look for options to close the loop on them or move them higher in environmental efficiency (i.e. repair, reuse, closer markets, upcycling)
Possible actions for later years	<ul style="list-style-type: none"> • Analyse GHG impact and look for more efficiencies in the collection, transport and processing operations • Work with processors to implement an environmental management system • Audit processors to ensure standards are being met • Conduct Life Cycle Analysis of the program and identify areas to improve • Switch to variable fees based on impact of individual producers products

6.4 Cost Effectiveness

Vision	To operate a program that works towards the awareness, collection and environmental visions in as cost effective a manner as possible
	<u>Actions</u>
year 1	<ul style="list-style-type: none"> • Establish baseline costs of program
year 2	<ul style="list-style-type: none"> • Make investments in research that could decrease future operating costs • Conduct collection material analysis to ensure all producers participating
Possible actions for later years	<ul style="list-style-type: none"> • Work on trying to reduce costs of collection, transport and processing in program • Look for synergies with programs in other jurisdictions or processors of similar materials to reduce costs • Promote sustainable purchasing as a way to improve end markets • Review fee categories to ensure that they fairly represent the materials being collected

6.5 Research & Development

Vision	To continually improve the program and conduct research and development to achieve this
	<u>Actions</u>
	<ul style="list-style-type: none"> Research to identify program areas that need improvement and identify actions to address them

7. Program Performance & Targets

CESA will assess the performance of the program with the quantitative measures noted below, which will be presented in the program annual reports (Appendix D)¹⁷ and available to the public on the CESA website. Actions to reach targets will also be included in the annual report.

7.1 Recovery Rate

Because of the durable nature of the CESA program products, each product unit sold should eventually be available for collection. The determination of the number units available for collection in a given year is subject to the availability of historic sales data and consumer use patterns which can be hard to determine. Due to the fluctuations in the marketplace and lack of accurate data, this program proposes to use a recovery rate model (comparing present year collections to present year sales).

Annual sales quantities will be recorded and that data will be used to calculate the future recovery rates.

Measures

<ul style="list-style-type: none"> Absolute collection (units and weight of product collected)
<ul style="list-style-type: none"> Recovery rate (% based on amount of product collected over amount sold in that year)
<ul style="list-style-type: none"> Absolute collection per capita (could be units and by weight)
<ul style="list-style-type: none"> Absolute collection by Regional District

Targets

While the Regulation calls for a 75% recovery rate or other rate that may be set by the Director, measuring the collection rate and setting a meaningful target presents a challenge. This is because this type of program does not exist elsewhere in North America so there is no historical information; the products have a range of average lifespans from 4-14 years; there is a lack of complete data on previous sales for all products in BC and the supply chain is complex and it will take time to ensure all producers are registered and reporting completely.

¹⁷ Kelleher, M. (2008). *Extended Producer Responsibility (EPR) Program Measurement and Tracking*. Prepared for Canadian Council of Ministers of the Environment.

CESA plans to increase collection annually of program products, collect BC specific data from producers and determine the most appropriate way to measure program performance with regards to collection. When the Program Plan is re-evaluated after five years, the experience and data gained during the first five years will allow for meaningful measures of performance and targets.

7.2 Consumer Awareness

The plan for creating consumer awareness is discussed in section 5.4. CESA will conduct the Market Research Study which, among other things, can establish a baseline of awareness among consumers. To measure the performance of the communication strategy, the Program proposes to conduct consumer awareness surveys at the start of the program, after the first year, after the third year and in the fifth year. The surveys will track consumer awareness of the program, if they know where to take the end-of-life appliances or where to find that information and if they know how to handle the appliances in a safe manner. This measure of consumer awareness will also be tracked with regard to urban, suburban, and rural areas, to help the Program address future plans to serve all citizens of the Province.

The ultimate measure is the level of consumer awareness but other measures can also be tracked that can assist the program to tailor its communication strategy. These could include number of visitors returning small appliances at a collection site, number of visits to the website, and, where possible, the impact of specific marketing elements. Progress on implementing the communications strategy will also be detailed in the annual report.

Measures

• Percentage of population aware of the program
• Participation rate (number of people returning program products)
• Website visits
• RCBC Recyclepedia website hits for program specific data
• RCBC Hotline calls about program

Targets

CESA will establish consumer awareness targets after baseline data is available. Targets for the increase in awareness can be set and then revised as further surveys are completed.

7.3 Accessibility

Measures

• Number of collection sites and collection events
• Population within a certain proximity of the drop-off depot
• Average travel distance to drop-off depot

Targets

Once the initial collection site network is established, the accessibility of collection sites for the BC population will be assessed. Future targets will be considered at that time.

7.4 Other Performance Measures

Other performance measures will be tracked, without setting targets, and new performance measures may be developed as the Program progresses. They will be included in the annual reports (Appendix D).

8. Stakeholder Consultation

There will be a stakeholder consultation process in October 2009 as a prerequisite to the filing of this plan. The consultation includes:

- Web based consultation using the www.productcare.org website
- Email communication to stakeholders and notification through the RCBC member advisory service as well as other organizations
- Regional consultations held in Richmond, Victoria, Kelowna and Prince George
- Written submission provided by stakeholders
- Meetings with key stakeholders
- A web conference call in October
- Commitment to send link to final approved plan to all participants (via email)

See consultation plan in Appendix E. Results of consultation meetings will be documented and included in the final version of the plan.

Appendix A. The Program Member List

3 M Corporation
Accent Fairchild Factory Group
Access Business Group
Air-King Limited
Anglo-Canadian Housewares, L.P.
Applica Consumer Products
*Banvil 2000
BISSELL Canada Corp.
Black & Decker
BlueAir
Broan – NuTone Canada Inc.
BSH Home Appliances
*Canarm Ltd.
Canavac Systems Inc.
Charlescraft Corporation Ltd.
Conair Consumer Products Inc.
Danby Products Ltd.
DeLonghi
Dorcy Canada Ltd.
Dyson Canada Ltd.
E.F. Appliances Canada Ltd.
Electrolux Home Care Products
Emerson Tool Company
Essick Air Systems
*Energizer Canada
*Envirogard/Rainfresh Water Filters
EuroPro
Fisher & Paykel Appliances Inc.
Focus Products Group (West Bend)
Groupe SEB
Krupps/Rowenta
T-Fal
Haier Group
Hamilton Beach Brands Canada, Inc.
Helen of Troy
*Honeywell Limited
H-P Products
Hung Hsing Electric
Hunter Fan
Ian Gough Sales Inc.
Ideal Security Inc.
Jarden Consumer Solutions (Sunbeam)
Kaz
Kidde Canada Inc.

Koblenz Electrica S.A. de C.V.
Lasko Products
Les Promotions Atlantiques Inc.
*Lutron Electronics Co.
LG Electronics Canada Inc.
Lindsay Manufacturing Inc.
Linear
MABE Canada Inc.
Metal Ware
Miele Inc.
National Presto Industries
Nilfisk/Advance of Canada
NuTone Inc.
Oreck
*OSRAM SYLVANIA LTD.
Panasonic Corporation
Philips Electronics Ltd.
Proctor-Silex Canada Inc.
Rexair LLC
S.C. Johnson & Sons
Saeco International
Samsung Electronics
Salter Housewares Canada Inc.
Salton Canada
Sanyo Electronics
Sanyo Fisher Company
Scott Fetzer Company
Sharp Electronics
Shop-Vac Canada Ltd.
Spectrum Brands (Remington)
SYNNEX Canada Limited
Tacony Corporation
TTI Floor Care North America
United Appliances
United Sales & Marketing Inc.
UPM Marketing Inc.
Viking Range
Vornado Air
Wahl Clipper
Whirlpool Canada LP
Winix
World Kitchen Canada
Zojirushi America

* - covered under other plans

Appendix B. Program Products

This plan is intended to capture **portable electrical appliances**, powered by 120V 60 Hz input power or batteries, **designed for use in homes** in the following categories:

1. Countertop Cooking Appliances

BC Recycling Regulation terms Section 3 -2.1(b): *Appliances for counter top cooking, including, without limitation, toasters, toaster ovens, fryers, hot plates, microwaves, coffee makers, coffee grinders, kettles, blenders, mixers and food processors; knives; devices for opening or sealing containers or packages*

Definition: Electrical portable appliances for food preparation that may include heating elements or motors.

Products Accepted: Household, residential countertop electrical appliances such as: toasters, toaster ovens, hot air corn poppers, deep fryers, rice cookers, slow cookers, bread makers, hot plates, food steamers, fry pan/griddles, fondue pots, woks, contact grills, tabletop grills, waffle irons, sandwich makers, countertop microwave ovens, percolators, drip coffee makers, coffee urns, espresso/cappuccino makers, coffee grinders, kettles, blenders, stand mixers, hand mixers, food processors, ice-cream makers, ice crushers, yogurt makers, juice extractors, juice press, food slicer, food chopper, knives, can openers, food bag sealers or food bag openers.

Products Not Accepted: Restaurant, commercial cooking and institutional cooking appliances performing the same functions. Appliances not powered by electricity or batteries. Built-in or over the range microwaves as these are included in Phase III. Appliances that perform this function that are part of a large appliance (i.e. ice crusher in a refrigerator).

2. Garment Care Appliances

BC Recycling Regulation terms Section 3 -2.1(b): *garment care appliances, including, without limitation, irons and mangle*

Definition: Electrical appliances for smoothing wrinkles from fabrics or for garment care.

Products Accepted: Household, residential irons, travel irons, stationary irons, cordless irons, garment steamers

Products Not Accepted: Industrial or commercial ironing appliances. Mangles used in ironing bedding materials in commercial establishments.

3. Floor Care Appliances

BC Recycling Regulation terms Section 3 -2.1(b): *floor and carpet care appliances*

Definition: Electrical portable appliances and their accessories that are used for dry or wet cleaning of floor and upholstery surfaces.

Products Accepted: Household, residential electric upright vacuum cleaners, canister vacuum cleaners, wet-dry vacuum cleaners, stick vacuum cleaners, handheld vacuum

cleaners, full-size extractor carpet cleaner, portable extractor carpet cleaner, floor or surface steamer, wet hard floor cleaners, hose and floor tools for central vacuum cleaner and their accessories.

Products Not Accepted: Ride-on or large scale vacuums used in industrial or commercial centres for floor care, floor scrubbing or sealing. Commercial or industrial wet vacuums or vacuum systems. Central Vacuum Cleaner Systems that are part of the home structure, including both the central power unit and piping and wiring.

4. Personal Care Appliances

BC Recycling Regulation terms Section 3 -2.1(b): *personal care appliances, including, without limitation, hair cutting and drying appliances, tooth care appliances, shavers and massagers*

Definition: Electrical portable appliances used for personal grooming or hygiene.

Products Accepted: Household, residential electric hair clippers, beard trimmers, hair dryers, curling irons or brushes, hair crimpers or straighteners, hair curlers, toothbrushes, foot baths and massagers.

Products Not Accepted: Floor supported commercial hair drying equipment.

5. Air Treatment Appliances

BC Recycling Regulation terms Section 3 -2.1(b): *portable air treatment appliances, including, without limitation, fans, air purifiers, humidifiers and air conditioners*

Definition: Electrical portable appliances used for space conditioning.

Products Accepted. Household, residential electric portable air purifiers, portable air cleaners, portable humidifiers, air fresheners, portable fans and portable heaters.

Products Not Accepted: Room Air Conditioners, Portable Air Conditioners (due to the refrigerants within them, they will be included in Phase III). Air treatment appliances designed for commercial or industrial use. Air treatment products attached to the furnace or central air conditioning system. Ceiling fans, range hoods, kitchen downdraft ventilation, bathroom fans, whole house fans, through-wall kitchen ventilators or heat exchangers.

6. Time Measurement Appliances

BC Recycling Regulation terms Section 3 -2.1(b): *Devices for measuring time*

Definition: Electrical portable appliances used for measuring or displaying time. Includes battery operated or mains connected appliances.

Products Accepted: Household, residential electric products for which the sole purpose is time measurement or display such as clocks (alarm clocks, wall clocks) or timers.

Products Not Accepted: Does not include wind-up clocks, windup watches or grandfather clocks. Does not include time instruments that are part of another product: i.e. clock as part of a clock radio.

7. Weight Measurement Appliances

BC Recycling Regulation terms Section 3 -2.1(b): *scales*

Definition: Electrical portable appliances used for measuring weight. Includes products powered by batteries or mains connected appliances.

Products Accepted: Household, residential body scales, countertop food scales

Products Not Accepted: Does not include mechanical scales that are not electric powered, doctor's scales or laboratory, commercial or industrial scales.

Draft

Appendix C. Vendor Standards

The CESA Program will include standards to ensure that program materials are collected, stored, transported and processed in a safe and environmentally sound manner in accordance with local, provincial and national regulations and international standards, as they may apply. Guidelines or manuals will be developed based on these standards for vendors.

Vendor Standards – General

The following elements may be included in the vendor standards:

1. Collection, transportation and processing services will only be provided by selected vendors in good standing.
2. All vendors will be subject to audit at the discretion of the program.
3. Vendors will be required to have a satisfactory tracking and reporting system.
4. Vendors will be required to demonstrate their business registration and liability insurance coverage.
5. Vendors will need to demonstrate and verify organizational compliance with, but not limited to, the following:
 - BC Environmental Management Act (as applicable)
 - BC Employment Standards Act
 - BC Occupational Health and Safety Regulation
 - Canadian Environmental Protection Act
 - Labour Code of Canada
 - Municipal zoning by-laws or other by-laws such as fire codes, parking and hours of operation
 - regulations of other jurisdictions (as applicable)
6. Vendors will be required to provide a statement of compliance as well as provide notification of any non-compliance.

Collection Standard

Collection Sites will have standards for matters such as:

- setting up the site,
- acceptable/not acceptable program products,
- staff training,
- records collection and retention,
- provision of program information for consumers,
- emergency reporting,
- planning and
- health and safety.

Transportation Standard

Transporters will be assessed for:

- conformity to applicable legislation and regulations,
- record keeping system,
- insurance coverage,
- licensing,

- emergency response plan, and
- staff training.

Processing Standard

A processing standard will be developed to cover the following elements:

- Insurance requirements based on processing activity
- Workers' compensation coverage
- Security of facilities
- Processing time specifications to prevent stockpiling
- Evidence of an Environment, Health and Safety management system
- Mapping of materials flow to downstream markets and processors which in turn must be subject to audit and meet all program standards which may include product management restrictions
- Residual and product management method declarations as requested e.g. certificate of recycling, landfill or destruction
- Reporting of processing activities including amount and type of waste, quantities of processed material sent for further processing or to downstream end-markets, corresponding destination by waste and product, and the recycling and disposal rates of products and waste
- Processing of waste must be done in an economic and environmentally acceptable manner.
- Emergency response plans and a contingency plan
- Maintain emissions controls (if applicable)
- Notify Program manager of any non-compliance events, fines, regulatory orders, or environmental incidents
- Maintain a closure plan

Appendix D. Annual Report Data

This following is a representation of the information may be included in annual reports.

List of producers participating in the program
Collection
Absolute collection (units and weight of product collected)
Recovery rate
Absolute collection per capita (could be units and by weight)
Absolute collection by Regional District
Awareness
Percentage of population aware of the program
Participation rate (number of visitors returning program products)
Website visits
RCBC Recyclepedia website hits for program specific data
RCBC Hotline calls about program
Accessibility
Number of collection sites and collection events
Population within a certain proximity of the drop-off depot
Average travel distance to drop-off depot
Other
Progress against stewardship plan targets and strategies
Amount of each type of material collected
Post-collection destination of material
Expenses (program specific) & distribution
Revenue (program specific)
Cost per unit of collected material
Total cost per kg diverted
Greenhouse Gas Emissions from transportation/collection/processing
Greenhouse Gas Emissions saved by recycling materials
Surveys will be conducted periodically to measure the consumer and program partner satisfaction

The above measures will be shown with previous years data (as the program progresses) to show the historical context and demonstrate any trends

These will be noted if they occur:

Number and nature of complaints
Service disruptions
Regulatory non-compliances
Awards and recognition

Appendix E. Consultation Plan and Report

Consultation meetings have been scheduled for the week of October 19, 2009. The following is the invitation letter which has been issued.

Save the date!
Notice of Public Consultation
for the BC Portable & Floor Care Appliance
Stewardship Plan

Dear Sir or Madam,

You are invited to attend consultation meetings scheduled for the review of the draft BC Portable & Floor Care Appliance Stewardship program plan at the following locations and dates:

9 am - 11 am, Monday, October 19, 2009
Sheraton Vancouver Airport Hotel
7551 Westminster Highway, **Richmond**, BC

1 pm - 3 pm, Monday, October 19, 2009
A **web conference** meeting. Log-in details will be sent to those who RSVP for this meeting.

8 am - 10 am, Wednesday, October 21, 2009
(same date & location as the Coast Waste Management conference)
Westin Bear Mountain Golf Resort & Spa
1999 Country Club Way, **Victoria**, BC
Continental breakfast will be provided

9 am - 11 am, Thursday, October 22, 2009
Ramada Hotel & Conference Centre
2170 Harvey Avenue, **Kelowna**, BC

9 am - 11 am, Friday, October 23, 2009
Ramada Hotel Downtown Prince George
444 George St., **Prince George**, BC

Please RSVP by Wednesday, September 25 to let us know which meeting you plan to attend. Please note that if it appears that there is insufficient attendance for any of the meetings, participants will be contacted to make alternative arrangements.

The draft program plan will be available prior to the meetings and will be posted on the [Product Care](#) website. Notification of posting will be emailed to invitees and to those who RSVP.

You are also invited to submit written comments to the program plan on or before Friday, November 6, 2009. Please send comments:

- by email to: erin@productcare.org
- or by mail to:
Portable & Floor Care Appliance Stewardship Plan
c/o Product Care Association
12337 82A Ave., Surrey, BC V3W 0L5
- or by fax to 604 592 2982

For further information and to RSVP, please contact Erin Webster at

erin@productcare.org
Telephone: 604 592 2972 x 208
Toll free: 1 888 772 9772 x 208
Fax: 604 592 2982

We look forward to meeting with you to discuss the BC Portable & Floor Care Appliance Stewardship Plan.

Larry Moore, Vice President, Canadian Appliance Manufacturers Association
Vaughn Crofford, President, Canadian Hardware and Housewares Manufacturers Association
Wayne Morris, Vice President, Association of Home Appliance Manufacturers

Communications about the consultation on this draft plan have been sent out to reach stakeholders who may be interested in portable and floor care appliance stewardship in BC. Key groups that have been notified include:

- Local Government including Regional Districts, BC Product Stewardship Council and the Union of BC Municipalities
- Senior Governments including BC Ministry of Environment
- Portable and Floor Care Appliance Industry including CAMA, CHHMA and AHAM members
- Recycling organizations including RCBC, Solid Waste Association of North America and Coast Waste Management Association
- Retailers including the Retail Council of Canada
- Processors & Transporters
- Environmental and public interest groups
- Other stewardship programs in BC (new and developing)

Feedback received from stakeholders will be recorded in the final plan submitted to the BC Ministry of Environment.

Appendix F. Abbreviations & Definitions

ABS	Acrylonitrile-butadienestyrene –a type of plastic
AC	Alternating Current
AHAM	Association of Home Appliance Manufacturers
BCIMEX	British Columbia Industrial Materials Exchange
CAMA	Canadian Appliance Manufacturers Association
CCME	Canadian Council of Ministers of the Environment
CESA	Canadian Electrical Stewardship Association
CHHMA	Canadian Hardware and Housewares Manufacturers Association
EPR	Extended Producer Responsibility
ESABC	Electronic Stewardship Association of British Columbia
GHG	Greenhouse Gas
HDPE	High Density Polyethylene
HIPS	High Impact Polystyrene
ICI	Industrial, Commercial & Institutional
PET	Polyethylene Terephthalate
PFC	Portable and Floor Care (Appliances)
RCBC	Recycling Council of British Columbia
RCC	Retail Council of Canada
WEEE	Waste Electrical and Electronic Equipment

Definitions

Capture Rate -the amount of material collected by an EPR program divided by the amount of product discarded in the same year

Producer - The product producer is principally the first-seller of the product in the province. In practice the producer is typically the product manufacturer, distributor or brand-owner. The producer could also be an importer, broker or retailer who sells the product directly to a consumer.¹⁸ (BC Recycling Regulation Guide)

Recovery Rate -comparing present year collections to present year sales

¹⁸ British Columbia Ministry of Environment (2006). *BC Recycling Regulation Guide*. Accessed June 8, 2009 at http://www.env.gov.bc.ca/epd/recycling/guide/pdf/recycling_regulation_guide.pdf

Appendix G. BC Recycling Regulation Requirements

Recycling Regulation Requirement section 5	Plan sections
1.(a) the plan will achieve, or is capable of achieving within a reasonable time,	--
(i) a 75% recovery rate or a higher recovery rate established by the director,	--
(A) for each subcategory listed in section 4 of Schedule 1 for the beverage container product category, and	NA
(B) for each product category covered by the plan, other than the beverage container product category, if required by the director,	7.1
(ii) any performance requirements or targets established by the director, and	NA
(iii) any performance requirements or targets in the plan,	7
(b) 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 product stewardship program, and	8
(c) the plan adequately provides for	--
(i) 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 sold, offered for sale or distributed in British Columbia,	5.1, 5.5
(ii) with respect to the solvent and flammable liquids, pesticide, gasoline and pharmaceutical product categories,	NA
(iii) reasonable and free consumer access to collection facilities,	5.1
(iv) making consumers aware of	--
(A) the producer's product stewardship program,	5.4
(B) the location of collection facilities, and	5.4
(C) how to manage products in a safe manner,	5.4
(v) assessing the performance of the producer's product stewardship program, the management of costs incurred by the program and the management of environmental impacts of the program,	6, 7
(vi) 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 product stewardship program,	5.5
(vii) eliminating or reducing the environmental impacts of a product throughout the product's life cycle, and	5.3
(viii) the management of the product in adherence to the order of preference in the pollution prevention hierarchy.	5.3
(2) In deciding whether to approve the plan, the director may consider any of the following:	--
(a) the advice of a committee of up to 12 persons the director appoints for the purpose of giving advice on the plan;	NA
(b) the timelines and effectiveness of the plan respecting the matters referred to in subsection (1);	1
(c) the population and geographical area of the markets in which the producer sells, offers for sale or distributes the product;	4.1
(d) the manner in which the product is marketed and retailed by the producer;	4.1

(e) the nature of the product;	3
(f) the amount of product the producer expects to sell or distribute each year;	4.1
(g) the amount of product the producer expects to collect each year;	4.2, 7.1
(h) the size of the population intended to be served by each collection facility;	5.1, 7.3
(i) the provision of convenient options for the collection of products in urban centres and small, isolated communities, and for persons with disabilities or who have no access to transportation;	5.1
(j) the manner, kind and amount of advertising and consumer education planned by the producer to inform consumers of the location and operation of collection facilities and the environmental and economic benefits of participating in the product stewardship program;	5.4
(k) the methods of product collection, storage, transportation and management;	5.1, 5.2
(l) the product stewardship programs of other producers for products in the same product category;	NA
(m) the structure of financial and operational co-operation with other producers.	3
(3) For the purposes of subsection (1) (c) (viii), the pollution prevention hierarchy is as follows in descending order of preference, such that pollution prevention is not undertaken at one level unless or until all feasible opportunities for pollution prevention at a higher level have been taken:	--
(a) reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency;	5.3
(b) redesign the product to improve reusability or recyclability;	5.3
(c) eliminate or reduce the generation of unused portions of a product that is consumable;	5.3
(d) reuse the product;	5.3
(e) recycle the product;	5.3
(f) recover material or energy from the product;	5.3
(g) otherwise dispose of the waste from the product in compliance with the Act.	5.3