Product Care Association DRAFT Manitoba Household Hazardous Waste Stewardship Program Plan

for the period January 1, 2017 – December 31, 2021

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1 Executive Summary

Product Care Association of Canada (PCA) currently operates the Manitoba Household Hazardous Waste Stewardship Program ("Program") under an approved stewardship plan pursuant to the *Manitoba Household Hazardous Material and Prescribed Material Stewardship Regulation* ("Regulation") issued under *The Waste Reduction and Prevention Act* (C.C.S.M. c. W40), for the period of April 1, 2011 to December 31, 2016. This renewal Program Plan covers the period January 1, 2017 – December 31, 2021 ("Program Plan").

The Program covers specific categories of household hazardous waste including paint, fluorescent lamps, flammable liquids, pesticides, physically hazardous, corrosives, toxics and environmentally hazardous materials ("Program Products") set out in the Schedule to the Regulation (see Appendix A). Program Products are classified under four major categories: paint, waste household hazardous materials (WHHM), pesticides and fluorescent lighting collectively referred to as Household Hazardous Waste (HHW).

The Program offers collection services at no charge to consumers. PCA does not directly own or manage collection sites, but continues to work with communities to expand the collection network.

Section 7 sets out the approaches that the Program takes to managing Program Products in accordance with the pollution prevention hierarchy, seeking where possible and economically feasible, the highest use option possible for each product category.

PCA employs a number of best communications practices to communicate information about the program to the public, which may include digital and traditional advertising, social media, community events, point of sales material, earned media, contests and promotions and partnerships, to increase awareness of the Program and its objectives and to stimulate consumer participation.

The program will report out on sales of program product and amount of waste material collected, product management approaches against the pollution prevention hierarchy, consumer awareness and the number of collection sites. The Program Plan, sets the following targets:

Table 1: Program Targets

Paint collection volumes	Increase absolute collection volumes 10% by 2021 over 2015 collection volumes.
Lamps collection volumes	Increase total collections of both fluorescent tubes and CFLs by 20% - 28% by 2021 over 2015 collection volumes.
Number of full service collection sites	10 by 2015 18 by 2017 24 by 2021
Consumer awareness	41% (paint) and 48% (other HHW) by 2017

	46% (paint) and 53% (other HHW) by 2019

Product Care held public consultations during the course of developing this Program Plan. A summary of stakeholder feedback and response is provided in Section 11.

2 Introduction

Product Care Association of Canada (PCA) currently operates the Manitoba Household Hazardous Waste Stewardship Program ("Program") under an approved stewardship plan pursuant to the *Manitoba Household Hazardous Material and Prescribed Material Stewardship Regulation* ("Regulation") issued under *The Waste Reduction and Prevention Act* (C.C.S.M. c. W40), for the period of April 1, 2011 to December 31, 2016. This renewal Program Plan covers the period January 1, 2017 – December 31, 2021 ("Program Plan").

The Program covers specific categories of household hazardous waste including paint, fluorescent lamps, flammable liquids, pesticides, physically hazardous, corrosives, toxics and environmentally hazardous materials ("Program Products").

PCA is a non-profit corporation established by its industry members to develop and manage product stewardship programs across Canada. PCA currently manages programs for fluorescent lights, paint, smoke and carbon monoxide alarms, flammable liquids, pesticides, and gasoline in other provinces. PCA is governed by a multi-sector industry board.

The program is funded by PCA members who remit Environmental Handling Fees (EHFs) to the program based on quantities sold in or into Manitoba.

3 Program Membership

PCA submits this Program Plan, on behalf of its members who are obligated under the Regulation as stewards in Manitoba.

The Regulation states that a "steward of designated material" means:

> (a) The first person who, in the course of business in Manitoba, supplies a designated material to another person; or
>
> (b) A person who, in the course of business in Manitoba, uses a designated material obtained in a supply transaction outside of Manitoba.

For the purposes of this Program Plan, stewards of designated materials are referred to as "obligated stewards".

Membership in the Program is open to all stewards of Program Products (see section4). Program members include manufacturers, distributors and retailers obligated under the Regulation. The Program also permits customers or suppliers of obligated stewards to join the Program and file required reports and fee remittances (e.g., a retailer may choose to join the

Program and report on all brands sold in or into Manitoba even though the retailer is not the obligated steward for all associated products).

4 Program Products Overview

PCA manages a number of stewardship programs across Canada from British Columbia to Newfoundland. Some of the Program Products captured under the Program are also included in other stewardship programs operated by PCA in other provinces. The Program seeks to harmonize with other product stewardship programs that cover similar products, where possible.

4.1 Stewarded Products

The Regulation defines "designated material" to include:

> "2. Devices, equipment, material, products or substances that are in the following categories of household hazardous material or prescribed material, and their containers, are designated as designated material for the purpose of the Act:
>
> (a) Waste household hazardous materials category;
> (b) Pesticides category;
> (c) Pharmaceutical products category;
> (d) Natural health products category;
> (e) Automotive antifreeze category;
> (f) Paint products category;
> (g) Fluorescent lighting tubes and compact fluorescent lights category;
> (h) Lead-acid automotive batteries category;
> (i) Rechargeable batteries category;
> (j) Other batteries category."

The Schedule to the Regulation sets out designated materials (see Appendix A). The Program only covers specific designated materials, as some of the other products are managed by separate stewardship organizations and programs.

The Regulation also defines what constitutes "waste material":

> **"waste material"** means
>
> (a) household hazardous material or prescribed material
>
> (i) that through use, storage, handling, defect, damage, expiry of shelf life or other similar circumstance can no longer be used for its original purpose, or
>
> (ii) that, for any other reason, the owner or person in possession of the material intends to dispose of; and
>
> (b) the container in which household hazardous material or prescribed material was supplied.

4.2 Program Product Categorization

Program Products are classified under four major categories: paint, waste household hazardous materials (WHHM), pesticides and fluorescent lighting. For the purposes of this Program Plan, these four categories are collectively referred to as Household Hazardous Waste (HHW). These categories are further divided into eight sub-categories ranked in the following order for classification purposes, with the first category taking precedence over the next and so on. If a product falls within more than one product category, it is generally classified based on the product's intended use, Transportation of Dangerous Goods classification or disposal method.

- Fluorescent Lights
- Physically hazardous materials
- Pesticides
- Paints
- Flammable liquids
- Corrosives
- Toxics
- Environmentally hazardous materials

For example, oil-based paint may be flammable, but is classified as paint. Antifouling paint, registered and labelled as a pesticide, is processed as a pesticide and therefore is categorized as a pesticide.

If it is unclear which category a product falls under, PCA will make a determination as needed.

For the purposes of classification under the Program, aerosols are classified according to their contents.

4.3 Included Products

This Program Plan covers Program Products described below in section 5 which are supplied for household use or application.

4.4 Products Not Included

In general, the Program does not accept:

- Products that are unlabelled or cannot be identified (unknowns)
- Products that are leaking or improperly sealed
- Commercial, industrial or agricultural products
- Cosmetics, health and beauty aids
- Insect repellents, disinfectants and pet products
- Pre crushed lamps

5 Detailed Product Category Definitions

The following section provides details regarding the products obligated under each of the main Program Product categories: paint, waste household hazardous materials, pesticides and fluorescent lighting. Each section provides an example of included and excluded products using the definitions provided in the Schedule to the Regulation (Appendix A) and CSA Standard Z752-03 ("CSA Standard"), as applicable.[1] Where there is a discrepancy between the definitions in this Program Plan (not including container sizes) and the CSA Standard, the CSA Standard prevails.

According to CSA Standard, products referenced in the Waste Household Hazardous Materials (WHHM) category description are for "household" and "domestic" use only. Accordingly, no products intended for industrial, commercial or institutional use are included in the Program.

To assist obligated stewards and others that do not have the ability to apply the technical CSA definition, PCA has developed a decision tree, with support from manufacturers, retailers, distributors and in consultation with Manitoba Conservation and Water Stewardship, to help clarify whether a product is included in the Program (see Appendix B).

5.1 Paint Products

Table 2 below describes included and excluded paint products based on the Schedule to the Regulation.

Table 2: Paint Product included and excluded

Category	Included	Excluded
Paint	• Architectural paints and stains • Marine paint • All types of paint aerosols • Maximum container size: 25 litres	• Non-aerosol automotive • Non-aerosol craft paint • Line marking paint • 2 component paints (catalyst or activator)

5.2 Waste Household Hazardous Materials

Five subcategories are included under the definition of Waste Household Hazardous Materials (WHHM) in the Regulation:

a) Flammable materials;
b) Corrosive materials;
c) Physically hazardous materials, including, but not limited to,

[1] The CSA Standard and associated product can be accessed through www.csa.ca.

a. Explosives (but not including ammunition), and
b. Medical sharps carrying pathogens;

d) Toxic materials;
e) Environmentally hazardous materials, including those materials that meet the criteria of being "toxic", and either "persistent" or "bio-accumulative" as those terms are described in Clauses 7.6.2.2. to 7.6.2.4. of that Standard[2].

Table 3 below describes included and excluded WHHM products based on the Schedule to the Regulation and the CSA Standard.

Table 3: WHHM Products included and excluded

Subcategory	Included	Excluded
(a) Flammable materials	• Flammable liquids that have a flash point under 37.8°C; have a fire point or contain water-immiscible liquids with a flash point under 37.8°C • Includes waste gasoline • In containers not exceeding 10 L capacity, except for gasoline: 25L	• Non-liquid flammable materials • Wine and distilled spirit beverages • Cosmetic and beauty products • Drugs, medicines and other health products • Gasoline not returned in an approved container
(b) Corrosive materials	• pH ≤1 or ≥13. A material with a pH >1 and ≤3, or a pH ≥11 and <13, may be included if acid reserve or alkali reserve meet test criteria, • Or if classified under TDGR as class 8 • Maximum container size 4 L	
(c) Physically hazardous materials	• Compressed gas fuel cylinders such as welding fuel, camping cylinders, butane cylinders, less than 5 kg.	• Class 1 explosives[3] (including ammunition) • Medical sharps • Refillable propane cylinders
(d) Toxic materials	• Vapour LC_{50} under 2500 mg/m^{3}and saturated vapour over 0.4 times the LC_{50} • Dusts and mists with LC_{50} equal to or under 2500 mg/m^3 liquids with a LD_{50} under 1000 mg/kg	• Mercury switches, products already captured in pesticide category

[2] The Standard refers to the CSA Standard Z752-03

[3] The CSA definition of Explosives includes both fuel gas cylinders as well as Class 1 explosives. The program excludes what would be known as explosives in common language.

(e) Environmentally hazardous materials, including those materials that meet the criteria of being "toxic", and either "persistent" or "bio-accumulative" as those terms are described in Clauses 7.6.2.2. to 7.6.2.4. of that Standard.[4]	Not Determined	

5.3 Pesticides

Table 4 below describes included and excluded pesticide products based on the Schedule to the Regulation.

Table 4: Pesticide Products included and excluded

Category	Included	Excluded

Pesticides	• Any consumer product that
	  ○ Has the poisonous (skull & cross bones) symbol;
	  ○ Pest Control Product (PCP) number; and
	  ○ The word “Domestic” and “Danger” on the label.
	• Maximum container size: 10 litres
		• Pesticides which do not have all of the poisonous symbol, the PCP number and the word “domestic” on the label
		• Insect repellents
		• Sanitizers and disinfectants
		• Pesticides for industrial, commercial or agricultural use

5.4 Fluorescent Lighting Tubes and Compact Fluorescent Lights

Table 5 below describes included and excluded lighting products based on the Schedule in the Regulation.

Table 5: Fluorescent Lighting Tubes and Compact Fluorescent Lights included and excluded

Category	Included	Excluded
Fluorescent lights	• Residential tubes of all lengths and shapes • Residential Compact Fluorescent Lights (CFLs)	All other lamp technology, such as, but not limited to: • Incandescent • High-intensity discharge (HID) lamps • Halogen

[4] To date, there have been no household products identified under this sub-category that are not already captured under the other WHHM sub-categories.

		• Light Emitting Diodes (LEDs)

6 Collection and Logistics

The Program does not directly own or manage collection sites, but rather contracts with interested organizations to provide collection services. The program is responsible for providing supplies, post collection management and support to the collection sites. There is no charge for the public to drop off Program Products at collection sites.

The program provides coverage for collecting and managing waste household hazardous material and prescribed material through the establishment of a network of collections sites, collection events, as well as large volume direct pickups for paint. As of December 31, 2015, the Program's collection infrastructure consisted of:

- 10 collection sites that collect all Program Products - paint, lights, pesticides and WHHM (Full Service sites)
- 42 collection sites that accept paint and lights only
- 14 collection sites that accept paint only
- 13 collection sites that accept lights only

Collection site hours of operation vary depending on the type of facility and sizes of community. To view maps of the existing collection sites see Appendix C.

In addition, PCA supports interim initiatives with municipalities that are interested in hosting collection sites, including holding single day HHW collection events in summer months around the Province. The Program also provides transportation and product management services to landfills in certain instances to address stockpiles of Program Product. In 2015, 17 HHW collection events were held in the Province, of which four were held in northern communities.

The Program has been working on some initiatives, including collection events, in order to provide services to northern and remote communities in Manitoba. Collection volumes from these events varied, with some events producing very limited success. Where possible, feasible, and sustainable, the Program will continue to work with other organizations and stewardship programs to collect and remove Program Products from these communities.

Due to the hazardous nature of some of the Program Products, and the various associated regulatory requirements, establishment of a collection site is much more challenging, complex and time consuming as compared to other non-hazardous stewarded products. Improving and expanding the collection network has been challenging due to various circumstances beyond PCA's control, such as, but not limited to:

- Limited existing HHW collection infrastructure at the outset of the Program;
- Zoning requirements for HHW storage structures;
- Higher than anticipated costs for collection sites to accommodate HHW; and

- Competing priorities at the local municipal level as a result of municipal amalgamation and regional flooding.

As a consequence of these challenges, several interested communities have experienced delays in obtaining necessary approvals to construct collection facilities. To assist with the infrastructure challenges, PCA has developed a financial assistance program to assist local communities with infrastructure development. This program has been successful in helping establish a number of collection sites to date and will continue to be made available in the coming years; evolving as required to align with future program objectives.

PCA will continue to actively pursue a more complete and robust collection system and assess the potential for establishing collection sites at facilities such as retailers, recycling organizations (both non-profit and for profit), local government recycling centres or transfer stations/landfills or at other associations or businesses. The Program will continue to assess the convenience and accessibility of the collection network on an ongoing basis as part of its efforts to improve collection services and continue to supplement the collection system with collection events, as needed.

Paint Exchange

In order to increase the quantity of leftover architectural paint which is re-used, PCA will continue to expand a "Paint Exchange" program with its contracted collection sites. The Paint Exchange program diverts better quality containers of paint (excluding aerosols) from recycling and makes them available for reuse at no cost to consumers. Other Program Products are not considered suitable for a reuse program.

Large Volume Users

Certain collection sites that are better able to handle large volumes are designated as "preferred sites" for consumers that generate large volumes of Program Product, such as commercial painters. Advance notice of large volumes may be requested to ensure proper storage and handling at the collection site. The Program gives consideration to special direct pickups for high volume generators. Collection sites may voluntarily limit the amount of Program Products accepted from a customer at any one time.

Transportation

The Program contracts out the function of transportation of Program Products from collection points to consolidation or processing locations, in accordance with requirements under the Federal Transportation of Dangerous Goods Regulation, Provincial Dangerous Goods Handling and Transportation Act and associated regulations such as The Hazardous Waste Regulation.

7 Product Management

The application of the pollution prevention hierarchy and the management of each product varies by Program Product.

The Program encourages consumers to buy the right amount of a consumable product for their needs resulting in less waste and a reduction in the volume of product needlessly purchased. This is achieved through the BUD Rule, promoted through the Program website and promotional material, which tells consumers to:

- Buy no more than you need.
- Use all that you buy.
- Dispose of leftovers safely.

Processing and recycling options in Manitoba vary by Program Product as outlined below. Where possible and economically feasible, PCA manages products according to the pollution prevention hierarchy. Products may be "downcycled" (i.e., managed through an available process that is lower on the pollution prevention hierarchy) at PCA's discretion.

The following section outlines the current product management processes employed by the Program by Program Product category. With the exception of paint and physically hazardous material (fuel cylinders), reuse is not appropriate for any other Program Products.

7.1 Paint

The Program allows paint to be reused by consumers free of charge through its Paint Exchange program. A description of Paint Exchange can be found in Section 6.

Latex paint is sent to a recycling facility to be reprocessed into paint and coating products. Unrecyclable latex paint is solidified and sent to landfill. Regulatory limits on VOC and limited demand for oil based paints make recycling an unviable option for this product category. Consequently, oil based paint is consolidated and blended with other flammable liquids and sent for energy recovery at licensed facilities.

Paint containers previously containing latex based paint are consolidated and sent to recyclers for shredding and recycling as scrap metal commodity. Paint cans that previously contained oil based paints are landfilled, and where possible will be managed in a similar fashion as latex paint cans.

7.2 Aerosol Paints

Residual volumes recovered from paint aerosols are small and represent a variety of product formulations that limit the options for recycling. Paint aerosol cans are punctured and contents drained. Propellant is absorbed by activated carbon and any residual paint is blended with other flammable liquids destined for energy recovery. The steel containers recycled as scrap metal. There is no reuse option for aerosol paints.

7.3 Flammable Liquids

Given the varied nature of flammable products, material mix/composition and limited volumes, it is not economically viable or feasible to reuse or recycle flammable liquids. Leftover flammable liquids and gasoline are blended and sent for energy recovery. Flammable aerosols are evacuated and the flammable liquid and container is treated in the same manner as paint aerosols.

7.4 Corrosives

No reuse option exists for corrosive material. Corrosives are neutralized, treated and stabilized with concrete for landfill, containers are recycled, and or landfilled, depending on the type and condition of the container. Corrosive aerosols are evacuated, the propellant absorbed by activated carbon, the metal can is recycled as scrap metal and the corrosive liquids neutralized.

7.5 Toxics

Due to the nature of toxic materials, there is no reuse or recycling option available. Toxic liquids are fuel blended and sent for energy recovery. Toxic solids are incinerated at high temperature in a government regulated and permitted incinerator. Metal containers are recycled and plastic containers are either recycled or landfilled depending on the type and condition of the container.

7.6 Physically Hazardous Material (fuel cylinders)

Fuel from fuel cylinders is either sent for energy recovery or is recaptured and reused. The metal is sent for scrap metal recycling.

7.7 Pesticides

Due to the nature of pesticides and aerosol pesticides, there is no reuse or recycling option available. All pesticides are incinerated at high temperature in a government regulated and permitted incinerator. The containers are either recycled or landfilled depending on the type and condition of the container. Pesticide aerosols are evacuated, propellants absorbed by activated carbon, and the metal cans are recycled. The residual pesticides sent for incineration.

7.8 Fluorescent Lights

Spent fluorescent lights are broken down into their component parts (i.e. mercury/phosphor powder, glass and metals) under a controlled environment and recycled where possible. The metal end caps are sent to a scrap metal recycling facility. The glass is processed and utilized as raw material. The mercury and phosphor powder is processed to remove the mercury from phosphor powder. The mercury is then distilled and sold as commodity for use in various manufacturing processes. The remaining treated phosphor powder is sent to landfill.

Mercury phosphor powder is currently sent to a recycler in the US, as no recycling options currently exist in Canada. PCA will continue to handle mercury phosphor powder in this manner, as long as export laws, such as the US export ban on mercury[5], do not create

[5] Mercury Export Ban Act of 2008: http://www.epa.gov/mercury/environmental-laws-apply-mercury#ExportBan

conditions that prevent PCA from doing so. Otherwise alternative material management may need to be considered, such as long term storage or stabilization, if no viable recycling option is available.

8 Performance Measures

The original program plan committed to developing performance measures over time assessing accessibility, product management and alignment of product management with the pollution prevention hierarchy. Since then, the program has reported out on annual product sales and products collected, number of collection sites, the products managed according to each product management approach, as well as consumer awareness (see section 9.2 below). Under this Program Plan, the Program will report out on the following performance measures for Program Products in its annual report.

Sales of program product and amount of waste material collected

PCA will report out on sales volumes of program products. With respect to waste material collected, PCA will set targets and report on the amount of waste material collected.

Collection Targets

Collection Targets are set based on observable trends in collection volumes and take into consideration anticipated higher than usual collection volumes during the start of the program as a result of bulk collections of product stored by consumers and collection facilities.

Paint

As anticipated, collected volumes of paint showed strong increases in the first two years of the program followed by continued, but more modest, increases in years 3 and 4. On that basis, the program will increase absolute collection volumes 10% by 2021 over 2015 collection volumes (320,253 L).

Table 6: Historic Paint Collection Volumes (Litres)

	2012	2013	2014	2015
Collection (Litres)	156,544	260,912	308,771	320,253

Lights

Historical collection of both CFLs and tubes have seen consistent increases year over year, however based on performance in similar lamps programs that PCA operates, collections tend to stabilize with more modest annual increases as the program matures. In addition, with technological transition of CFLs and fluorescent tubes to LED lamps, sales of CFLs have been declining rapidly along with decreases in sales of fluorescent tubes. Therefore, while the program anticipates that the absolute number of CFL lamps and fluorescent tubes collected will

continue to increase annually during the term of this program plan, it is expected that the rate of increase will decrease significantly year over year. On this basis, the program will increase total collection units of both fluorescent tubes and CFLs by 20% - 28% by 2021 over 2015 collection volumes (96,561 units).

Table 7: Historic Light Collection Volumes (Units)

	2012	2013	2014	2015
Collection	11,819	48,525	74,822	96,561

Recovery Rate

Both sales volume and waste material collected give an overall picture of program performance that is more accurate than the program's recovery rate. Data collected since the start of the program confirms that certain performance measures, specifically recovery rate[6], are not useful measures of success for stewardship programs managing paint and household hazardous wastes for various reasons:

- With the exception of lamps, paints and household hazardous wastes are designed to be consumed. Therefore, it is arguable that a low recovery rate could indicate strong program performance, suggesting consumers are being efficient with the use of the paint they purchase. Indeed, PCA actively promotes reduction by promoting campaigns highlighting the BUD rule: "Buy what you need, use what you buy and dispose of leftovers safely." This rule serves to reduce the amount of waste generated which further drives down the recovery rate.
- The relationship between volumes of program products purchased and recycled is not linear. Consumable program products have a long shelf life and leftover product may be stored by the consumer for long periods of time with the intention of later use.
- The time span between the purchase of a product and the decision by a consumer that it is no longer needed varies considerably and is heavily dependent on consumer habits.
- Lighting products are not consumable, so theoretically recovery rates can reach 100% with one lamp recovered for each new one installed. However, even in the case of lamps, reference to recovery rates as a measure of program performance is problematic. The lifespan of a fluorescent bulb can vary depending on a number of factors including bulb quality and technology, the usage location (e.g., lights used in recessed fixtures may have a shorter lifespan) and hours of use. There is also a pantry effect with lamps, where consumers purchase multiple lamps for future use which may sit in the pantry unused for long periods of time. For these reasons it is not accurate to assume that the amount sold in a given year is equal to the amount available to be collected and recycled.

[6] Recovery rate is the amount of material collected divided by the amount of material sold in the same year.

For these reasons, PCA will continue to report out on program recovery rates for appropriate program product categories but will not use recovery rate as a target.

Product management against the pollution prevention hierarchy

PCA will continue to report out on the approach to managing each product category in relation to the pollution prevention hierarchy.

Consumer Awareness:
The plan for increasing consumer awareness is discussed in section 9.2 below. Consumer Awareness targets for the Program are set out in Table 8.

Table 8: Consumer Awareness Targets

Year	Paint	Other HHW
2014	36%	43%
2017 Target	41%	48%
2019 Target	46%	53%

Number of Full Service Collection Sites:

See Section 6 for a discussion of the development of the Program's collection network and associated challenges. The number of collection sites are scheduled to increase as follows:

Table 9: Full Service Collection Sites Targets

Year	Total number of full service collection sites targeted
2015	10
End of 2017	18
End of 2021	24

The Program will target specific regions based on community interest and the objective of increasing accessibility. While there are many factors that influence the likelihood of communities participating in a stewardship program, it is estimated that 24 full service collection sites will be established by 2021. Table 10 shows the targeted regions for increased accessibility over the period of this plan. To view a map of these regions, see Appendix D.

Table 10: Target Regions

Region
Burntwood
Nor-Man
Central
Interlake
Winnipeg & Capital Region
Midwest

Western
North Eastern
South Eastern
Parkland

9 Communications

9.1 Program Communications

PCA employs a number of best communications practices to communicate information about the program to the public, to increase awareness of the Program and its objectives, and to stimulate Program use. Under the Program Plan, the Program commits to the following:

a) Program Website

The Program website at http://www.regeneration.ca/programs/paint/manitoba/, http://www.regeneration.ca/programs/pesticides-flammable-liquids/manitoba/, and http://www.lightrecycle.ca/consumers/manitoba/accepted-products/ will continue to provide information to Manitoba residents on:

- Collection locations with details on hours of operation and accepted products
- Details on applicable Environmental Handling Fees
- Annual reports and other program administrative information
- Program FAQs, including information for consumers on buying the right amount of paint as well as the safe storage and handling of program products
- PCA contact information, including an in-site live chat tool

b) Annual Communications Strategy

PCA will develop and execute a communications plan on an annual basis to address the specific needs of the Manitoba recycling market. The communications plan will:

- Employ research on the habits and perspectives of Manitoba residents to inform in-market tactics
- Make use of promotional channels that are relevant to Manitoba residents, taking into account the varied geography of the province
- Be subject to ongoing review and revision based on measurable performance indicators

The Annual Communications Plan may employ the following channels:

- Digital and traditional advertising
- Social media engagement
- Community events
- Point of sales material dissemination

- Stakeholder communications
- Earned media efforts
- Contests and promotions
- Government and other partnerships
- Other opportunities as best practices dictate

9.2 Public Awareness Levels

The Program completed an initial awareness survey in 2015 to determine the level of public awareness. The results indicated that 36% of Manitobans are aware of the existence of a program that recycles paint and 43% are aware of the existence of a program that recycles household hazardous waste.

The program commits to conducting a public awareness survey every two years (i.e., 2017, 2019, and 2021) with findings reported out in the Program's annual report. PCA anticipates that awareness levels will increase as communications efforts continue over the term of the Program Plan. Consumer awareness targets are listed in Section Performance Measures8.

10 Administration

10.1 Environmental Handling Fees (EHFs)

The program is funded by members who pay Environmental Handling Fees (EHFs) to the Program based on the number of units of Program Products sold in Manitoba. Quantities sold are reported each reporting period using an online system. No fees are charged to consumers at the point of collection.

EHFs are set through the Program budgeting process and are reviewed and approved by PCA's Board of Directors. EHFs are used only for program purposes including, but not limited to communications, administration, collections, processing and government fees. It is at the option of the member whether or not to recover the EHFs paid to the program, in which case EHFs may be listed as a separate invoice item or included in the product price.

The program ensures that member remittances are correct through the use of a compliance system that includes member reviews/audits.

Detailed audits of members are performed on a regular basis to ensure both compliance and completeness in the reporting of EHF to PCA. Audit selection is a function of, but not limited to, materiality, irregularities, non-compliance with PCA's policies, and PCA's audit framework. Audits follow established procedures and may involve, but are not limited to, the following sales records, purchase records and accounts payable records. Audit procedures consist primarily of enquiries, analytical procedures, discussion, and examination related to information provided by the member.

10.2 Risk Management and Reserve Fund

The Program manages environmental risk in a number of ways including, but not limited to, service provider selection criteria, policies and guidelines and site visits. The program also maintains environmental insurance to strengthen the risk management system.

The program has also established a reserve fund which is included in the program's multi-year budgeting and serves primarily to provide financial stability for the program, particularly in the context of the declining revenue derived by the program from mercury containing lights (e.g. CFLs and tubes) as the consumer market for these products shifts to other lighting technologies (e.g. LEDs). The reserve fund is continually monitored, and is subject to a reserve fund policy determined by PCA's Board of Directors. The reserve fund is also available for other purposes including the funding of any uninsured environmental claims, fluctuations in operating costs and to fund the support provided by the program for collection site infrastructure improvement.

10.3 Steward Recruitment

In order to maintain a 'level playing field' for the program members and to ensure compliance with the Regulation, the Program actively searches for, identifies and recruits stewards of program products.

Once a potential steward is identified, PCA follows a formal compliance process protocol to recruit them into the Program. PCA will seek assistance as needed from Manitoba Conservation or Green Manitoba to ensure regulatory compliance of obligated stewards who refuse to comply with the Regulation.

10.4 Dispute Resolution Procedure

PCA contracts with all suppliers and service providers to the Program by the use of commercial agreements. Disputes arising from collection or processing contracts are resolved using normal commercial legal procedures, which may include mediation, arbitration or formal legal proceedings depending on the nature of the dispute.

11 Stakeholder Consultation

Stakeholder consultation will be conducted, as a prerequisite to the filing of this final plan with Manitoba Conservation and Water Stewardship. The consultation will include:

- Email communication to stakeholders (who will be requested to forward it to their members where appropriate)

- Digital advertising via Search Engine Marketing (SEM) throughout the province. Digital impressions will served to Manitobans who search a large inventory of key words related to the program. Digital ads will invite them to offer their feedback and queries on the program and to learn more via the program website
- Print advertising in key regions through the province, especially via community newspaper channels. Ads inviting Manitobans to offer their feedback and queries on the program and to learn more via the program website, ReGeneration.ca
- Consultation request posted on the News section of the program website, ReGeneration.ca
- Consultation request posted to Manitobans only on the program's Facebook page

The program may also consider hosting a webinar. A draft version of this plan will be posted on the program website during the consultation period and appropriate changes will be made based on stakeholder input.

Appendix A. HHMPM Product Category Schedule to Manitoba Regulation

Category Name	Description of Included Devices, Equipment, Material, Products or Substances
Waste Household Hazardous Materials	Devices, equipment, material, products and substances that meet the criteria for waste household hazardous materials set out in the CSA Standard Z752-03, Definition of Household Hazardous Waste, including, but not limited to, devices, equipment, material, products and substances that meet the criteria for (a) flammable materials; (b) corrosive materials; (c) physically hazardous materials, including, but not limited to, (i) explosives (but not including ammunition), and (ii) medical sharps carrying pathogens; (d) toxic materials; or (e) environmentally hazardous materials, including those materials that meet the criteria of being "toxic", and either "persistent" or "bio-accumulative" as those terms are described in Clauses 7.6.2.2. to 7.6.2.4. of that Standard.
Pesticides	Control products, as defined in the Pest Control Products Act (Canada), registered under that Act that (a) are required to be labelled with the product class designation "Domestic"; and (b) display on the label the symbol shown in Schedule III of the Pest Control Products Regulation (Canada) for the signal word "Poison"; but not including the following pest control products: (c) insect repellents; (d) sanitizers and disinfectants; (e) products for use on pets; (f) unpackaged products or products not ordinarily sold to, used or purchased by a consumer without repackaging.
Pharmaceutical Products	A substance or mixture of substances manufactured, sold or represented for use in (a) the diagnosis, treatment, mitigation or prevention of a disease, disorder or abnormal physical state, or its symptoms; or (b) restoring, correcting or modifying organic functions; including, but not limited to, medications available with or without a prescription, but not including contact lens disinfectants, antidandruff products and shampoos, cosmetics, antiperspirants, antiseptic or medicated skin-care products, sunburn protectants, mouthwashes, fluoridated toothpastes, and veterinary medications and products. This category is limited to household quantities of pharmaceutical products.
Natural Health Products	A natural health product as defined in The Natural Health Products Regulation under The Food and Drugs Act (Canada). This category is limited to household quantities of natural health products.
Automotive Antifreeze	

Paint Products	1. Latex, oil-and solvent-based architectural coatings, whether tinted or untinted, including paints and stains for commercial and homeowner use, but not including unpressurized coatings supplied in containers with a capacity of more than 30 L. 2. Paints and stains sold in pressurized aerosol containers.
Fluorescent Lighting Tub Compact Fluorescent Lights	
Lead-Acid Automotive Batteries	Devices that convert chemical energy to electrical energy for use in motor vehicles.
Rechargeable Batteries	Devices that convert chemical energy to electrical energy and that can be restored to full charge by the application of electrical energy.
Other Batteries	Devices that convert chemical energy to electrical energy including, but not limited to, zinc-air, zinc-carbon, lithium, silver-oxide or alkaline-type batteries, but not including batteries in the lead acid automotive batteries and rechargeable batteries categories.

Note: This is an excerpt from the regulation for reference, and is not a listing of what is included in this Program Plan. For a list of Program Products, see section 4.

Appendix B. HHW Product Classification Decision Tree

First, check that your product is not listed in the Excluded List on the last page of this decisions tree, then proceed. Start Here:

Manitoba HHW (Flammables, Corrosives, Toxics) Decision Tree

November 18, 2013

FLAMMABLE CATEGORY

Does the product label display a Flammable symbol?

No → The product is **not** in the Flammable category.

Yes → Is the product a liquid, spray, or solid?

Solid → The product is **not** in the Flammable category.

Liquid or spray → Is the product intended for use down-the-drain (e.g. inside the kitchen, bathroom, laundry room etc.) during its primary intended use – for example, toilet deodorizer, plumbing anti-freeze?

Yes → The product is **not** in the Flammable category.

No → The product **is** in the Flammable category.

CORROSIVE CATEGORY

Does the label of the product (including liquids, sprays, or solids) display a Corrosive symbol?

No → The product is **not** in the Corrosive category.

Yes → Is the product intended for use down the drain (e.g. inside the kitchen, bathroom, laundry room etc.) during its primary intended use – for example, laundry bleach, drain cleaner, toilet bowl cleaner?

Yes → The product is **not** in the Corrosive category.

No → The product **is** in the Corrosive category.

TOXIC CATEGORY

Does the product label display a Poison symbol?

No → The product is **not** in the Toxic category

Yes → Does the symbol use the word "**DANGER**"?

No → The product is **not** in the Toxic category

Yes → Is the product a liquid, spray, or solid?

Solid → The product is **not** in the Toxic category

Liquid or spray → The product **is** in the Toxic category.

FIRST check that your product is not listed in the MB HHW Excluded List on the last page of this decision tree, then proceed.

				Comments
FLAMMABLE CATEGORY	1.	Does the product label display a Flammable symbol? 	Yes	Go to step 2.
			No	The product is **not** in the Flammable category. Go to step 4 (Corrosive symbol).
	2.	Is the product a liquid, spray, or solid?	Liquid or spray	Go to step 3.
			Solid	The product is **not** in the Flammable category. Go to step 4 (Corrosive symbol).
	3.	Is the product intended for use down-the-drain (e.g. inside the kitchen, bathroom, laundry room etc) <u>during its primary intended use</u> – for example, toilet deodorizer, plumbing anti-freeze?	Yes	The product is **not** in the Flammable category. Go to step 4 (Corrosive symbol).
			No	The product **is** in the Flammable category. *Classification is finished.*
	4.	Does the label of the product (including liquids, sprays, or solids) display a Corrosive symbol? 	Yes	Go to step 5.
			No	The product is **not** in the Corrosive category. Go to step 6 (Poison symbol).
	5.	Is the product intended for use down the drain (e.g. inside the kitchen, bathroom, laundry room etc) <u>during its</u>	Yes	The product is **not** in the Corrosive category. Go to step 6 (Poison symbol).

CORROSIVE CATEGORY		primary intended use – for example, laundry bleach, drain cleaner, toilet bowl cleaner?	No	The product **is** in the Corrosive category. *Classification is finished.*
TOXIC CATEGORY	6.	Does the product label display a Poison symbol? 	Yes	Go to step 7.
			No	Product is **not** in the Toxic category and is **not** a designated material under the program. *Classification is finished.*
	7.	Does the symbol use the word "**DANGER**"?	Yes	Go to step 8.
			No	The product is **not** in the Toxic category. Product is **not** a designated material under the program. *Classification is finished.*
	8.	Is the product a liquid, spray or solid?	Solid	The product is **not** in the Toxic category. The product is **not** a designated material under the program. *Classification is finished.*
			Liquid or spray	The product **is** in the Toxic category *Classification is finished.*

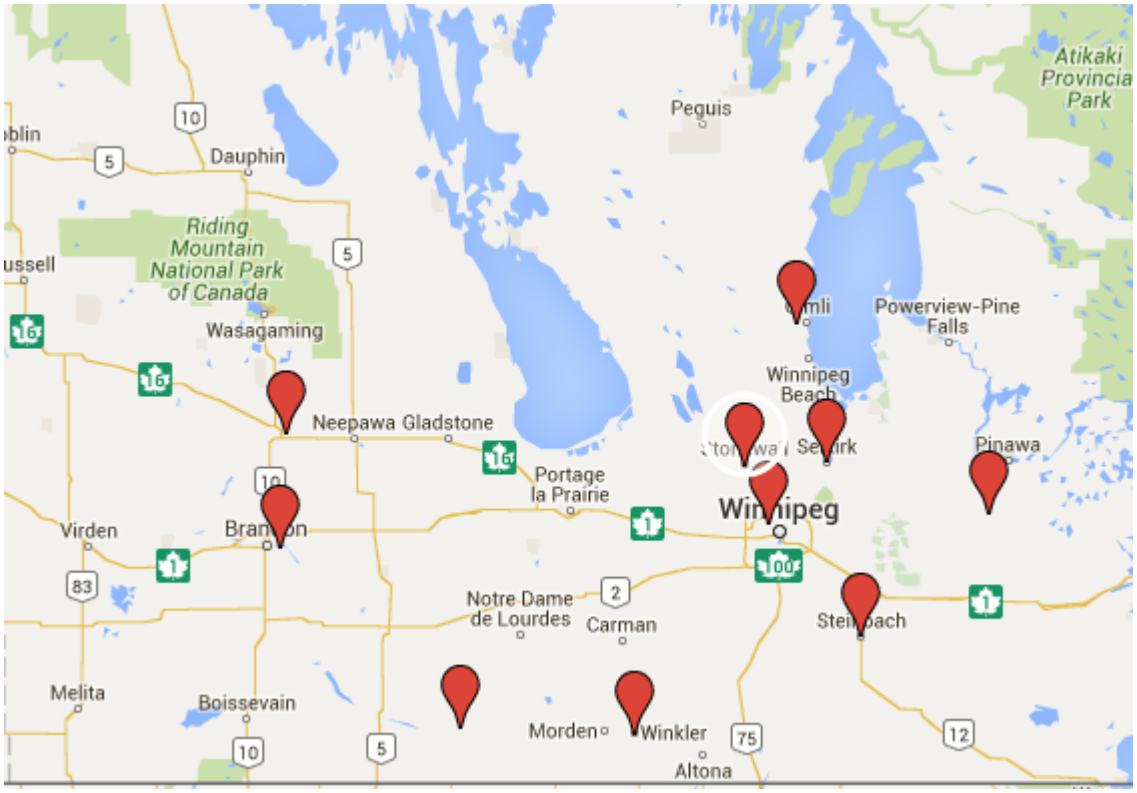
List of Manitoba HHW Excluded Products:

- Commercial, industrial, or agricultural products
- Powder forms (solid) of masonry products, cement, grout, mortar, plaster of Paris
- Caulking compounds
- Lead acid batteries
- Oil / Antifreeze

- Mercury switches
- Fertilizer
- Wine and distilled spirits
- Drugs and medicines
- Diesel
- Medical sharps
- Insect repellents, disinfectants and pet products
- Cosmetics
- Ammunition
- Refillable propane cylinders

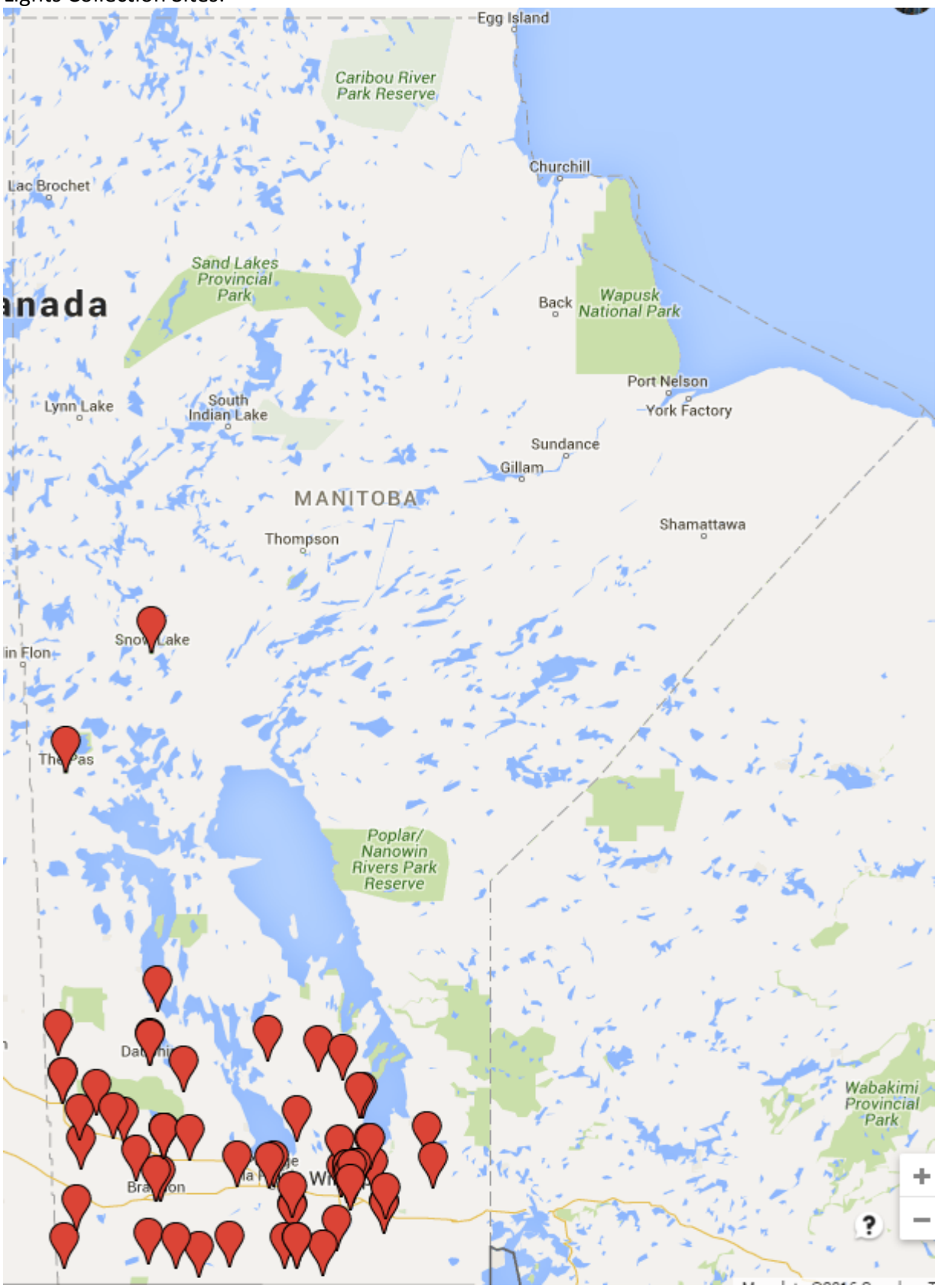
Appendix C. PCA Collection Sites

Full Service Collection Sites:



Paint Collection Sites:

Lights Collection Sites:



Appendix D. Manitoba Regional Map