



## British Columbia Paint and Household Hazardous Waste Stewardship Plan

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

- Paint
- Solvents and Flammable Liquids
- Pesticides
- Gasoline

**For submission to:**

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## GLOSSARY

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

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

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

## 1 INTRODUCTION

This Paint and Household Hazardous Waste Stewardship Plan (“Stewardship Plan”) is submitted to the British Columbia Ministry of Environment by Product Care Association of Canada (“PCA”) on behalf of the major brand owners of paint and household hazardous products sold in British Columbia, pursuant to the requirements of the [BC Recycling Regulation](#) (“Regulation”)<sup>1</sup> and replaces the previous stewardship plan developed and implemented by PCA in 2006.

The Paint and Household Hazardous Waste Stewardship Program (“Program”) has been in operation since 1994 for paint and 1997 for Household Hazardous Waste (HHW)<sup>2</sup>.

## 2 DUTY OF PRODUCER

For reference, Section 2(1) of the Regulation provides:

*Except as otherwise specifically provided in this regulation, a producer must*  
*(a) have an approved plan under Part 2 [Product Stewardship Plans] and comply with the approved plan, or*  
*(b) comply with Part 3 [Product Stewardship Program Requirements If No Product Stewardship Plan]*  
*with respect to a product in order to sell, offer for sale, distribute or use in a commercial enterprise the product in British Columbia*

The Regulation defines a “Producer” as:

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

The BC Recycling Regulation Guide makes further reference to the definition as “... importer, broker or retailer who sells the product directly to a consumer or imports and uses the product in a commercial enterprise and includes catalogue or internet transactions”.<sup>3</sup>

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

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

<sup>3</sup> British Columbia Ministry of Environment, *Recycling Regulation Guide*, April 2012.  
[http://www2.gov.bc.ca/assets/gov/environment/waste-management/recycling/recycle/reg\\_guide2012.pdf](http://www2.gov.bc.ca/assets/gov/environment/waste-management/recycling/recycle/reg_guide2012.pdf).

### 3 APPOINTMENT OF A STEWARDSHIP AGENCY

The Program is developed, managed and operated by PCA, a not-for-profit industry association that manages product stewardship programs for paint, household hazardous and special waste on behalf of its members across Canada. PCA was established as an agency to allow its members (obligated Producers) to meet their obligations under applicable extended producer responsibility legislation. PCA is incorporated under the *Canada Not-for-Profit Corporations Act*<sup>4</sup> and is governed by a multi-sectoral industry board of directors, with representation from four membership classes (Paint Products, Lighting and Alarms Products, Retail and Other Products). A list of PCA's Directors is available on PCA's website, [www.productcare.org](http://www.productcare.org). Any changes to PCA's incorporation classification will be referenced in the Program's annual report, as applicable.

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

Each Producer appoints PCA as its agent to carry out the duties imposed by the Regulation, including responsibility for costs associated with maintaining the system and ensuring that the program is financially self-sufficient. PCA members represent the vast majority of the paint household hazardous waste market in British Columbia for obligated products. Program members may include the manufacturers, brand owners, distributors, first importers and retailers of obligated products in BC. Program membership is open to all obligated Producers. A current list of Program members, as well as other member-related information, is available on PCA's website, [www.productcare.org](http://www.productcare.org).

In joining PCA, each Producer must agree in writing to appoint PCA as its agent to carry out the duties of the Producer imposed by section 2(2) of the Regulation. The Stewardship Plan confirms the duties that PCA will perform on behalf of each Producer that is a member of the Program. Confirmation of membership is available upon the request to the Director.

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

### 4 PRODUCTS COVER UNDER THE STEWARDSHIP PLAN

The following section sets out the scope of products captured by and excluded from the Program, along with a non-exhaustive list of examples. A detailed and updated list of all products accepted by the Program ("Program Products") can be found on PCA's website, [www.productcare.org](http://www.productcare.org).

In addition to the products set out below, the Program accepts the following materials:

- Already empty paint containers

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<sup>4</sup> The Canada Not-for-Profit Corporations Act is available at: [https://www.ic.gc.ca/app/scr/cc/CorporationsCanada/fdr/CrpDtIs.html?corpId=3894185&V\\_TOKEN=1485282119530&crpNm=product care association of canada&crpNmbr=&bsNmbr=](https://www.ic.gc.ca/app/scr/cc/CorporationsCanada/fdr/CrpDtIs.html?corpId=3894185&V_TOKEN=1485282119530&crpNm=product%20care%20association%20of%20canada&crpNmbr=&bsNmbr=)

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

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

## 4.1 Paint Products

### 4.1.1 Paint Products Included in the Program

The Regulation defines paint products as:

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

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

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

- Interior and exterior water-based (e.g. latex, acrylic) and oil-based ( e.g. alkyd, enamel) architectural paint
- Deck, porch and floor coating (including elastomeric)
- Varnish and urethane (single-component)
- Concrete and masonry paint
- Drywall paint
- Undercoats and primers (e.g. metal, wood, etc.)
- Stucco paint
- Marine paint<sup>5</sup>
- Wood finishing oil
- Melamine, metal and anti-rust paint, stain and shellac
- Swimming pool paint (single-component)
- Stain blocking paint
- Textured paint
- Block fillers and sealers
- Wood, masonry, driveway sealer or water repellent (non-tar based or bitumen based)
- Paint aerosols of all types including automotive, craft and industrial products

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

#### 4.1.2 Non-Program Paint Related Products

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

- Industrial paint and finishes
- Paints or wood preservatives that are registered as a pesticide under the Pest Control Products Act (has a P.C.P Registration number on the label)<sup>6</sup>
- Non-Aerosol craft paint
- Non-Aerosol automotive paint
- Two-part or component paints containing a catalyst or activator
- Roofing products (i.e. patch, tar or repair)
- Tar or tar/bitumen-based products
- Traffic or line marking paint
- Resins, fibreglass
- Paint thinner, mineral spirits or solvents<sup>7</sup>
- Deck cleaners
- Colourants and tints
- Caulking compound, epoxies, glues or adhesives
- Nitro-cellulose based paints
- Brushes, rags and rollers
- Paint containers with poor integrity (e.g. badly rusted cans) or leaking

## 4.2 HHW Products

### 4.2.1 HHW Products Included in the Program

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

#### 4.2.1.1 Flammable Liquids

The Regulation defines “Flammable Liquid” products as:

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

*(i) products containing less than 50% water-miscible flammable liquid, as defined by the National Fire Code of Canada, 1990, as published by the National Research Council of Canada, by volume with the remainder of the product not being flammable,*

*(ii) liquids that have no fire point as tested by the ASTM D1310 Tag Open Cup Test Method,*

*(iii) wine and distilled spirit beverages,*

*(iv) cosmetic and beauty products,*

*(v) drugs, medicines and other health products,*

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

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

<sup>7</sup> These products are considered under the flammable liquids category (see section 4.2.1.1 below).

- (vii) pre-packaged products produced for use by commercial or industrial enterprises without resale to other consumers as pre-packaged goods,*
  - (viii) products in the paint product category,*
  - (ix) coatings formulated for industrial or automotive use, and*
  - (x) pre-packaged kerosene in containers larger than 9 litres, and*
- (b) paint strippers containing methylene chloride.*

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

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

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

The Program may introduce a Product Classification Decision Tree to assist members in classifying products under the flammable liquids category. In the event that the Program proceeds with a Decision Tree, it will be submitted to the Ministry of Environment for inclusion in this Plan.

#### **4.2.1.2 Domestic Pesticides**

The Regulation defines "Domestic Pesticides" products as:

- (1) Subject to subsection (2), the pesticide product category consists of control products registered under the Pest Control Products Act (Canada) that*
  - (a) are required to show on the label the domestic product class designation, and*
  - (b) display on the label the symbol shown in Schedule III of the Pest Control Products Regulation (Canada) for the signal word "**Poison**".*

Subsection (2) is as follows:

*(2) The pesticide product category does not include the following:*

- (a) insect repellents;*
- (b) sanitizers and disinfectants;*
- (c) pet products;*
- (d) unpackaged products or products not ordinarily sold to, used or purchased by a consumer without repackaging.*

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

#### **4.2.1.3 Gasoline**

The Regulation defines "Gasoline" products as:

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

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

#### **4.2.2 Non-Program HHW Related Products**

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

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

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

## 5 STAKEHOLDER CONSULTATION

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

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

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

- In-person consultation on October 19, 2016 at the Coast Waste Management Association (CWMA) Conference in Victoria, BC.
- Conference call and webinar with members of the BC Product Stewardship Council on March 14, 2017.
- Two public webinar consultations in March 2017.

A list of who attended the consultations and their affiliations, where available, is provided in Appendix A.

Deadline for stakeholder feedback in writing was April 14, 2017. During each consultation, stakeholders had the opportunity to ask questions about the draft Stewardship Plan, including Program commitments and targets. Questions and feedback received during the consultations were taken into consideration by PCA in finalizing the Stewardship Plan and are summarized in Appendix B along with PCA’s. The updated Program Plan, including comments and responses, was posted on productcare.org and all stakeholders, notably those who provided comment, were informed by email.

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

- Visiting collection sites on a regular basis
- Engaging continuously with program members through daily interactions and online feedback
- Consulting with National HHW Advisory Committee members

## 6 COLLECTION SYSTEM AND CONSUMER ACCESSIBILITY

### 6.1 Collection system

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

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

As of December 31, 2015, the Program operated 216 permanent, year round collection sites in British Columbia. Of this total, 115 were paint collection sites and 101 were PaintPlus collection sites.

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

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

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

PCA will continue to have discussions with those First Nations communities who are ready, interested and in a position to discuss the possibility and best service options for their community. In general, where feasible, PCA aims to provide a one-stop-shop collection service for consumers by collaborating with other stewardship programs to co-locate collection services in the same location. Feasibility constraints include factors such as agreement amongst stewards regarding the desired location for collection, suitability and capacity of collection sites to accept different types of stewarded products, volumes of materials available for collection, the readiness of communities to support collection services and costs associated with facilitating collection.

PCA also augments the permanent collection system with a number of one day events, often in collaboration with a municipality or regional district. For those who qualify, the Program offers a direct pick-up service for businesses and entities that generate large volumes of Program Product.

### **Performance Metrics**

The Program will maintain a minimum of 200 collection sites in total, including between 95 and 105 Paint Plus collection sites. The number and location of paint collection sites, Paint Plus collection sites and one day events will be published annually in the Program's annual report.

## **6.2 Accessibility**

The Program has a mature and well-established collection system that provides consumers access to collection facilities in accordance with the SABC Accessibility Standard. The Standard defines reasonable access as a 30 minute drive to a collection site in urban areas of population greater than 4,000, and a 45 minute drive to a collection site in rural areas with a population greater than 4,000. As of the end of 2016, the Program had established a comprehensive network of 216 collection sites with a 98.37% accessibility rate for PaintPlus collection sites and 97.58% accessibility rate for Paint collection sites. The Program will continue to seek opportunities to expand the collection system.

### **Performance Metrics**

The Program will maintain an accessibility rate of 93% based on the SABC Accessibility Standard. An accessibility study will be conducted every five years (next study in 2021), with additional studies undertaken if the number of depots falls below 2016 levels (216 Paint collection sites).

### **6.3 End of life management**

The objective of the Program is to minimize the improper disposal of Program Products by providing an effective collection program and ensuring that the collected materials are either recycled or disposed of in an environmentally responsible manner. The Program encourages consumers to return their unwanted Program Products to Program collection sites, rather than disposing of them improperly in the garbage or directly into the environment. In addition to the Program, consumers or end users may contract with hazardous waste management companies to dispose of their unwanted products. The Program strives to manage collected Program Products using the highest option on the pollution prevention hierarchy as set out under section 5(1)(c)(v) of the Regulation, where economically feasible and viable. The application of the pollution prevention hierarchy and the management of each product varies depending on options available and economic feasibility, including appropriate recycling technologies, qualified service providers, and operational costs related transportation and management of the materials.

### **Waste composition audits**

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

### **Performance Metrics**

The Program will report out on the number and location of waste composition audits conducted annually and the amount of Program Product identified, as applicable.

### **6.4 Performance monitoring and reporting commitments**

### **6.5 Volume Collected**

Unlike some other stewarded products, such as tires, pharmaceuticals and electronics, Program Products are consumable products that don't necessarily have an expiry date after which they are no longer usable. Rather, consumers may keep Program Products in their possession for years after initial use. Program Product is only considered waste at the point where the consumer no longer values it or determines they no longer have any use for it. Factors such as the consumable nature of the product, varied product life expectancy, and consumer behavior make it difficult to evaluate program performance and to utilize recovery rate as a performance target. In general, program performance should be evaluated based on a suite of performance metrics and in aggregate, focusing on trends as opposed to absolute numbers or one particular metric.

The recovery rate compares the volume of product collected in a given year to the volume of product sold in that same year:

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

While recovery rate is acknowledged as an important indicator of program performance, there are several important reasons to evaluate it in context, not in isolation. It is, in fact, a ratio of two values, which can be influenced by different factors in a given year, such as market conditions and consumer purchasing behaviour. Despite a higher recovery volume and consumer awareness in a given year, the recovery rate can decline in comparison to the previous years if sales have increased at a higher rate. On the other hand, a decrease in the recovery rate may be a reflection of consumers using paint more efficiently. It is important to look at trends over time in conjunction with other performance indicators.

The volume of Program Product collected is measured via “container capacity volume” (CCV), also known as “equivalent litres of containers” (ELC) and the “residual recovery volume” (RRV). CCV is defined as the measurement of the maximum capacity of containers, if they were full, returned through the Program. CCV figures are extrapolated from the number of “tubskids” of Program Products managed by the program. Tubskids are collection bins used to transport containers of Program Products from collection sites to processing facilities. In contrast, RRV represents the actual quantity of residual paint (excluding containers) collected by the Program, measured in litres. An increase in RRV over time generally indicates an improvement in program performance, however many other factors unrelated to program performance may explain an increase or decrease in RRV over time, such as population change, consumer purchasing habits, housing market activity, product reformulation and regulatory changes. As a result of these changing factors, CCV is used to create performance metrics and targets for this Stewardship Plan.

Table 1 below provides an overview of the container capacity volume, in litres, of program products collected by the Program from 2010 to 2015.

**Table 1: Container Capacity Volume 2010 – 2015 (Litres)**

	Paint (Non-Aerosol)		Paint Aerosol		Flammable Liquids		Pesticides	
	CCV	% Change Yr/Yr	CCV	% Change Yr/Yr	CCV	% Change Yr/Yr	CCV	% Change Yr/Yr
<b>2010</b>	9,407,232	---	158,200	---	258,345	---	66,182	---
<b>2011</b>	9,618,048	2.2%	192,588	21.7%	289,930	12.2%	69,638	5.2%
<b>2012</b>	9,801,648	1.9%	202,440	5.1%	301,760	4.1%	75,902	9.0%
<b>2013</b>	9,938,160	1.4%	231,298	14.3%	305,516	1.2%	70,286	-7.4%
<b>2014</b>	10,611,994	6.8%	236,285	2.2%	344,010	12.6%	92,578	31.7%
<b>2015</b>	11,448,864	7.9%	244,860	3.6%	377,111	9.6%	93,917	1.4%

**Performance Measures and Targets**

Table 2 provides a summary of CCV targets for 2017 to 2021. Moving forward from 2021, targets will be reassessed and adjusted as necessary.

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

- Total volume collected by product category using CCV,
- Volume collected by regional district by product category using CCV,
- Total amount sold by product category (L)
- Total RRV collected (L)
- Annual recovery rate

**Table 2: Container Capacity volume Targets 2017-2021\***

Product Category	Target (2017-2021)
Paint (Non-aerosol & Aerosol)	1-3% annual increase in container capacity volume (CCV) based on 2015 volumes.
Flammable liquids	1-2% annual increase in container capacity volume (CCV) based on 2015 volumes. (Subject to review based on future sales.)
Pesticides	1-2% annual increase in container capacity volume (CCV) based on 2015 volumes. (Subject to review based on future sales.)

\*Targets 2022 onward will be assessed as necessary in 2021.

## 7 CONSUMER AWARENESS

PCA uses a number of methods to raise consumer awareness of the program, including the location of collection facilities and information regarding product handling. These methods may include:

- **Program Website:** The ReGeneration website<sup>8</sup> provides information to BC residents on:
  - Collection site locations with details on hours of operation and products accepted
  - Description of products accepted by the program
  - Details on relevant environmental handling fees
  - Annual reports and other program information
  - Information for consumers on buying the right amount of paint as well as the safe storage and handling of program products
- **Website Links:** PCA coordinates with other parties, such as regional districts, to establish links to the program's website.
- **Reuse Websites:** To promote its PaintReuse program, PCA is listed on relevant Reuse sites such as *Surrey Reuses*, and others.
- **Point of Sale (PoS) Materials:** Program brochures and posters are regularly distributed to over 3,000 retailers. Orders are replenished upon request, free of charge, and materials are regularly updated.
- **Point of Return Materials:** Collection sites are offered program signage to display, and counter cards to distribute, to consumers.

<sup>8</sup> <http://www.regeneration.ca/>

- **Stewardship Program Collaboration:** PCA collaborates with other stewardship agencies in BC to develop common promotional materials, such as the BC Recycling Handbook.
- **Social Media:** PCA manages social media channels on Facebook, Twitter, Instagram and YouTube in order to communicate and engage with the public. On these channels, PCA shares educational content about programs and responds to comments and questions received.
- **Digital Advertising:** PCA runs a targeted digital campaign through Yellow Pages to display search ads (e.g. Google and Bing), as well as display ads to ensure program content is displayed where people are looking for it.
- **Traditional Advertising:** PCA runs TV, print and radio advertising in order to promote public education and awareness of programs. Running ads across the media spectrum ensures multiple touchpoints with target audiences.
- **Earned Media:** The Program will continue to pursue an earned media strategy in order to promote program awareness, including press releases, public service announcements and television appearances through TV networks.
- **Community Events:** attend community events to promote the program. Examples of possible events include earth day celebrations, summer festivals, tradeshow, etc.
- **RCBC Recycling Hotline:** PCA contracts with the Recycling Council for the RCBC “recycling hotline” service. RCBC hotline operators provide consumers with a convenient “one stop” contact to obtain information about PCA programs and any other recycling questions. PCA promotes the RCBC hotline number through its web page, on its signs, and brochures. The RCBC Hotline is typically open Monday through Friday, and is accessible to all BC residents by a toll free telephone number.
- **RCBC Recyclepedia:** PCA collection sites are also listed in the RCBC Recyclepedia website search and app available for iOS and Android devices.
- **Local Government Partnerships:** PCA works with municipalities and regional districts (RDs) to promote the PCA program. Specific actions include:
  - Advertising in municipal garbage collection/recycling calendars.
  - Local government website links (see above).
  - Point of purchase consumer information material made available to all municipalities free of charge.
- **Ambassadors Program:** Summer ambassadors may be utilized for community events to engage the public and drive awareness of recycling programs.

**Consumer Awareness Levels:**

Unlike other consumer products, paint and HHW products are used by select consumers, typically on an infrequent basis and therefore are not top of mind products. PCA has conducted various consumer awareness studies since program inception. Awareness levels in general have slowly and steadily increased over time. In 2013, the awareness level was found to be 66 per cent. A subsequent study in 2015 saw a decline in consumer awareness level to 62 per cent. There are many variables that could contribute to the reported decline, such as time of year of survey distribution, however, the reasoning is uncertain. The 2013 survey was conducted in September, when consumer awareness is heightened (spring and summer are peak painting seasons), while the 2015 survey was conducted in December when consumers are less likely to be painting their homes. Another study will be conducted in 2017 to gauge current consumer awareness and compare to previous years' findings.

**Performance Measures and Targets:**

The Program will continue to utilize the various communications activities discussed above as warranted and appropriate. Consumer awareness surveys will be conducted every two years, starting in 2017 to track awareness levels with findings reported in the Program's annual reports. The program will aim to achieve a consumer awareness level in the range between 60%-70%.

**8 MANAGEMENT OF PROGRAM COSTS**

The Program is funded by Environmental Handling Fees (EHF) paid to PCA by its members based on the volume of sales of the designated products in BC. The EHF may appear at the time of retail sale as a separate charge or be integrated into the product price. The EHF is not a tax or a refundable deposit. Rather, it is a service fee subject to provincial sales tax. Program revenues generated by the EHF's are applied towards program operations, including but not limited to:

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

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

EHF rates are set by PCA and are subject to change as needed to address surpluses or deficits. Given that the Program does not have any influence over the sales of new products, EHF's are reviewed on a regular basis to ensure there are sufficient funds to operate the Program and maintain the necessary reserve as per PCA Board policy. Current EHF's for Program Products are listed on the PCA's website, [www.productcare.org](http://www.productcare.org).

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

## 9 MANAGEMENT OF ENVIRONMENTAL IMPACTS

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

### 9.1 Reduce and Redesign

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

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

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

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

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

### 9.2 Reuse and Recycle

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

#### Reuse

Reusable paint is given away at no charge through the Paint Reuse program to consumers to be used for its originally intended purpose. In 2015, 142 collection sites participated in the Paint Reuse program, representing 66% of all collection sites. Approximately 2.5% of the total volume of paint collected in 2015 was reused through the Paint Reuse program. Users of the Program included individuals, community

organizations, theatres and anti-graffiti programs. Many consumers obtained information about the Paint Reuse program through the RCBC Materials Exchange program.<sup>9</sup>

Reuse is not an option for HHW products due to:

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

### **Recycling**

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

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

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

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

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

In 2015, 79% of the latex paint was either recycled into paint or utilized in the manufacturing of concrete products.

Unlike paint, HHW products encompass a very broad range of product categories, industry sectors, product types and uses with different uses/applications, ingredients, concentrations, physical state, etc. Consumer HHW products generally come in smaller packages. Some ingredients in older products are no longer allowed to be in use or sold in the marketplace. There are also very few recyclers that can handle

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<sup>9</sup> <http://www.rcbc.ca/services/materials-exchange>

these product categories, none of whom are in BC. These factors all contribute to increased costs to manage these products, as well as reduce program efficiencies and the ability to recycle products. For these reasons and others, HHW products are not recycled.

#### **Energy Recovery:**

As noted above, not all paint is suitable for recycling and as such, requires alternative management options. Depending on the type of paint, paints (including latex) typically have varying degrees of heat value, which makes them more or less suitable for energy recovery, especially alkyd paints. Some cement kilns and incinerators have the necessary environmental approvals or permits to allow the use of alternative fuel, such as paint, in place or in conjunction with traditional fuel sources, such as natural gas. Energy recovery may continue to be one of the options utilized for the management of all paint products. In 2015, 7% of latex paint and 100% of oil-based paint collected was sent for alternative energy recovery at a permitted/licensed facilities.

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

#### **Disposal**

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

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

### **9.3 Containers**

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

- Being less attractive to recyclers if the container contents were of a hazardous nature (e.g., pesticides) requiring special handling pursuant to regulation prior to recycling or alternative management,
- Being unable to completely clean containers, as cleaning often results in more waste generation,
- Paint and HHW containers being considered low grade and less desirable by metal and plastic recyclers,

- Protective coatings on metal cans that pose challenges for the recycling system,
- The low volume and inconsistency of type and colour of plastic of containers compared to other sources of plastic;
- Fluctuations in commodity pricing and market demand, and
- The limited number of recyclers that have the ability to handle such products.

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

**Table 3: Summary of Management Options 2015**

Method	Explanation	Paint		Flammables Liquids		Pesticides		Gasoline	
		Residuals	Containers	Residuals	Containers	Residuals	Containers	Residuals	Containers
<b>Reuse</b>	Given to a consumer in original condition through "Paint Reuse"	2.5%	--	--	--	--	--	--	--
<b>Recycling</b>	Reprocessed as paint, used in concrete and cement manufacture	79% of latex paint	100% of metal and #2 plastic containers	--	100% of metal containers	--	100% of plastic containers	--	100% of metal and plastic containers
<b>Energy Recovery</b>	Alternative fuel	100% of oil based paint, 7 % of latex paint	98% of polypropylene cans	100%	--	--	--	100%	--
<b>Incineration</b>		--	--	--	--	100%	--	--	--
<b>Landfill</b>		14% of latex paint	--	--	--	--	--	--	--

**Performance Measures and Targets:**

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

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

**Performance Metrics**

Where technically feasible and economically sustainable, and recognizing that the product management is subject to change, the Program will:

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

**10 DISPUTE RESOLUTION**

PCA contracts with service providers (e.g., collection sites, transporters, etc..) using commercial agreements. Any disputes arising from service provider contracts are discussed with PCA’s senior management in attempts to resolve the dispute. Any dispute requiring further escalation is resolved using normal commercial legal procedures as set out in the terms of our service provider contracts.

**11 PERFORMANCE MEASUREMENT SUMMARY AND REPORTING COMMITMENTS**

Metric	Performance Measure
<b>Collection System and Accessibility</b>	
Number of collection sites	Maintain a minimum of 200 collection sites in total, including between 95 and 105 Paint Plus collection sites
	Report annually the number and location of paint collection sites and PaintPlus collection sites
Number and location of collection events	Report annually
Percent of population with access to a collection site	Maintain a minimum of 95% accessibility rate to a collection site based on SABC Accessibility Standard
<b>Waste Audits</b>	
Number and location of waste audits conducted	Report annually
Units of program product identified during waste audits	Report annually
<b>Collections</b>	

Metric		Performance Measure
<b>Collection System and Accessibility</b>		
Percentage annual increase in container capacity volume (CCV) based on 2015 volumes	Paint (Non-aerosol & Aerosol)	1-3% annual increase
	Flammable liquids	1-2% annual increase
	Pesticides	1-2% annual increase
Total volume collected by product category using CCV		Report annually
Volume collected by regional district by product category using CCV		Report annually
Total amount sold by product category (L)		Report annually
Total RRV collected (L)		Report annually
Recovery rate		Report annually
<b>Consumer Awareness</b>		
Consumer awareness survey		Conduct every two (2) years starting in 2017
Percent of population aware of the program		Maintain between 60%-70%
<b>Management of Environmental Impacts</b>		
Significant developments, provided by its membership, that reduce the environmental impact and improve the recyclability of Program Products, as applicable		Report annually
Percentage of collected paint reused and recycled		Report annually
Number of collection sites offering Paint Reuse		Report annually
Approximate percentage of program products and containers managed according to the pollution prevention hierarchy		Report annually
Percentage of latex paint recycled		Maintain a minimum rate of 75%
Percentage of metal and #2 plastic paint containers recycled		Strive to recycle 100%
Percentage of metal and #2 plastic gasoline containers		Strive to recycle 100%

## APPENDIX A. STAKEHOLDERS WHO ATTENDED AT THE CONSULTATIONS

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

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

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

## APPENDIX B. SUMMARY OF STAKEHOLDER FEEDBACK AND RESPONSES

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

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

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

4. PROGRAM PRODUCTS			
Question #	Sector	Question/Comment	Response
P9	Non-Profit	The statement in the list of accepted paint items under the proposed plan update states: Interior & Exterior: latex, acrylic, water-based, alkyd, enamel, oil-based consumer paints when above it clearly defines accepted paint as: (a) latex, oil and solvent-based architectural coatings, including paints and stains for <b>commercial and household use</b> , whether tinted or untinted, and including empty containers for any of these. Further to my previous feedback, to reduce confusion here, this should be consistently worded throughout the document especially in the list of accepted materials which will likely be the most referenced section.	The classification of program products has been clarified in the Program Plan.
P10	Non-Profit	I understand, at this point, the materials accepted under HHW include flammable liquids, pesticides, and gasoline only. I am respectfully requesting that an amendment to the Recycling Regulation be investigated to include bleaches and corrosive materials whether it be in addition to the HHW materials under Product Care's mandate or through an additional stewardship plan, these materials are hazardous enough to warrant a warning label but are currently not eligible for any end of life programs.	See response to question P1 above.
P11	Non-Profit	Road and traffic marking paints are also an item we get contacted about annually. Whether or not they are accepted into this program, there should be an avenue for disposal available for these products that does not involve utilizing a specialized waste hauler to deal with an empty can.	The Program is only responsible for product categories identified under the BC Recycling Regulation. The issue of managing non-obligated products should be referred to the Ministry of Environment.
P12	Industry	Clarity on definitions - what is in and out of the program : The document uses "shortcuts" in describing products, such as what is included and how it should be classified. This raises questions and issues for members. For example as noted above, referring to the whole program as BC PaintRecycle, when in fact it is the whole Paint and HHW program, leads to confusion. The details in describing programs and product definitions are extremely important and need to be clarified. As one specific example, flammable symbols are found on aerosol products. The symbol is	The plan has been amended to provide further clarity with regard to product definitions. PCA intends to continue working with CCSPA to discuss product definitions that comply with the regulations and are as easy as possible to interpret by retailers, consumers and collection sites.

4. PROGRAM PRODUCTS			
Question #	Sector	Question/Comment	Response
		there based on flame extension. This does not necessarily mean the liquid in the aerosol has a flash point that would meet the definition of a flammable liquid under the BC Recycling Regulation. The program needs to clearly reflect what is captured by the Regulation only. This needs to be clarified for all products, so that stewards are paying accordingly.	
P13	Local Government	Is PCA planning program collaboration with BC Used Oil Recycling? Residents do not necessarily distinguish that there are two separate programs for gasoline and oil.	Generally, the automotive industry is a different industry than the paint and HHW industry. However, on an operational level, the Program seeks to partner with other stewardship organizations wherever possible to make the collection of stewarded products more efficient for consumers (e.g., one stop shop).
P14	Local Government	There are a lot of products we received and we are covering the costs currently and they are quite sizable. Was wondering about putting forward those products. For example, flammable products or some paint products.	The determination of product categories is set by the Ministry and is outside the scope of the Program Plan. During the webinar, Ministry representatives invited the person asking the question to follow up with them directly about which products are regulated and which are not.
P15	Industry	Marine paints and Wood preservatives - The way it is, people may look at it and simply dismiss the need to include these paints (since the plan says they aren't part of the paint category) but they still need to be part of the pesticide category to facilitate diversion and also to help pay their share.	The representation of products in the Products section of the Program Plan has been modified in response to the comment.
P16	Service Provider	There are areas where the program does not take responsibility for the empty container even though a consumer has paid the eco fee. This becomes a cost to the depot for disposal. Not accepting the empty container does not eliminate the issue, as some consumers will abandon the container if given the opportunity. These containers may be empty, but they are still contaminated and should be the programs responsibility.	The Program manages empty containers that are obligated under the regulation.

4. PROGRAM PRODUCTS			
Question #	Sector	Question/Comment	Response
P17	Industry	Opportunity for harmonized provincial definitions: solvents/flammables - CCSPA and our members keep top of mind that we were working with PCA toward standardized definitions such as for solvents/flammables: definitions that are science based and can work in multiple provinces such as BC, Manitoba, Ontario and Nova Scotia.	PCA agrees with CCSPA as to the benefit of harmonizing product definitions. PCA is participating in the process developed by the Canadian Council of Ministers of the Environment (CCME) to harmonize definitions and we continue to do so in collaboration with CCSPA and other industry stakeholders. We will work through PCA's Paint/HHW Advisory Committee for this purpose.
P18	Industry	Future harmonization opportunities: pesticides - Provincial harmonization is equally important going forward for other materials, such as for pesticides and in future, in programs such as Nova Scotia. There is an opportunity to get the Nova Scotia definitions right, from the start. That will mean not necessarily following what we have in the current BC program in many cases. These definitions need to be open to discussion. As above, CCSPA is willing to continue to work with PCA toward this goal.	See response to question P17 above.
P19	Industry	Page 5- If the Plan is going to quote the regulations, I would recommend a full quote. Otherwise, it leaves the reader wondering what subsection (2) is about and if not researched, the reader might not understand the full meaning of "pesticides". Subsection (2) is as follows: (2) The pesticide product category does not include the following: (a) insect repellents; (b) sanitizers and disinfectants; (c) pet products; (d) unpackaged products or products not ordinarily sold to, used or purchased by a consumer without repackaging.	The plan has been modified as suggested.

4. PROGRAM PRODUCTS			
Question #	Sector	Question/Comment	Response
P20	Industry	"Skull and cross bones" (page 5) - These are really explanatory notes and therefore, they can be a bit more fulsome in the explanation. The BC regulations only reference the shapes of the symbols by virtue of referring to Schedule III. By definition under the PCP Act and Regulations, if a label uses these symbols referenced under the PCP Regs, the labels must also use the wording under the PCP Act and Regs. In other words, the symbols and wording are inseparable if required on a label.	The representation of products in the Products section of the Program Plan has been modified in response to the comment.
P21	Industry	4.2 Non-Program Products - To me, this section is confusing since it does not say which program -- is it the paint program or the HHW program? Which program? By clearly identifying the program, it will help to put the inclusions or exclusions in the right context. Should it say the following? : The Paint Program does not collect ...	The Program plan has been modified in response to the comment.
P22	Industry	"Paint or wood preservatives", section 4.2 - Assuming it is the paint program then I suggest saying: Paints, Marine Paints or Wood Preservatives that are registered as a pesticide under the Pest Control Products Act and meet the definitions as outlined in this document under section 4.1(c) "Pesticides", will be included as a pesticide and not included as a paint. Without this directive, one might look at it and think that the Program does not collect these items under any category and not bother to report them.	The Program plan has been modified in response to the comment.
P23	Industry	Second paragraph - I would even add: Pesticides that do not meet the definition as set forth Section 4.1(c) of the Plan. Or alternatively, Those pesticides whose label does not bear the "DOMESTIC" classification in addition to the term "Danger", "Warning" or "Caution - Poison" and the "skull & crossbones" symbol. Without it, it leaves the reader thinking that all pesticides are included, including non-poisonous ones.	The Program plan has been modified in response to the comment.

4. PROGRAM PRODUCTS			
Question #	Sector	Question/Comment	Response
P24	Industry	Second paragraph, third bullet point - I would add in brackets (e.g. agricultural pesticides which are managed by CleanFarms). This explains why they are not collected and points the reader in the right direction if they have agricultural products.	The Program plan has been modified in response to the comment.

5. STAKEHOLDER CONSULTATIONS			
Question #	Sector	Question/Comment	Response
S1	Local Government	5. Stakeholder Consultation, Page 7: “Consulting with National HHW Advisory Committee members” Information on this committee could not be located on the Product Care/Regeneration website. Who sits on this committee and what is its mandate?	The National HHW Advisory Committee was established in 2016. It is comprised of industry representatives from HHW product and business sectors (manufacturers, retailers, trade associations). It deals mainly with product technical matters such as definitions. Information about the Committee’s mandate has been incorporated into the program plan. PCA generally does not post the list of committee members on its website.
S2	Industry	The deadline for written comments to Product Care was April 14, 2017, which afforded just two weeks to review and collect meaningful comments. We appreciate that on April 13, 2017, PCA was able to confirm an extension to April 21, 2017, for CCSPA. Given the members have a great many other provincial and federal priorities to deal with, we are able to provide only topline comments and hope that the following requests can be accommodated to assist our members in understanding the revised plan.	The first consultation notice was sent on March 10, 2017 and the draft plan was posted on March 9, 2017. A reminder was sent to all stakeholders on March 13 and, as noted, extended upon request.

5. STAKEHOLDER CONSULTATIONS			
Question #	Sector	Question/Comment	Response
S3	Industry	Given the short opportunity for consultation, CCSPA requests that PCA provide a clear comparison of the existing and proposed programs, and the specific cost or other impacts on the steward companies. While some members have been able to take a closer look, others have not had this opportunity. As well, some are asking questions; as the wording is often not clear; and we need to know if there are any intended changes to what is in or out of the program. A comparison is needed to help members understand the changes and impacts, if any.	The program plan does not propose any changes to included/excluded products.
S4	NA	How many people attended the [CWMA] consultation?	Thirty-three people attended the consultation held at CWMA in October 2016.
S5	Local Government	Will the [slides from the March 14th] presentation be sent out to participants?	Powerpoint slides were made available to all the participants who participated in the webinar consultations.
S6	Service Provider	When is the next webinar in this process over the next few weeks or months?	In person consultations were held at the CWMA conference on October 18, 2016. Webinar consultations were held on March 14, 16 and 30th.
S7	Industry	Would that be possible to get the slide deck after today?	See response to question S5.
S8	Local Government	Will the presentation be sent out?	See response to question S5.

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

6. COLLECTIONS			
Question #	Sector	Question/Comment	Response
C2	Service Provider	Would that be possible to give a breakdown of the number of sites of collection sites, how many municipal facilities, bottle depots, non-profit sites make up the total 200 sites to roughly get a sense of the back bone of the system.	The Program does not track collection sites by sector. A list of collection sites is provided in the Program's annual report, which is posted on PCA's website.
C3	Local Government	The tubskids provided for the storage and collection of products are sometimes in poor condition, and can allow the collection of rain to accumulate inside. Can you commit to maintaining the quality and condition of the collection containers provided to collection sites?	The Program works with our collection network and transporters to ensure that collection containers are in good condition. Reusable collection containers are environmentally preferable and cost effective. We also encourage staff at collection sites to use care in handling the containers to avoid damage to them. Any damaged containers are pulled out of service for repair or replacement. All collection sites are requested to report any damaged collection containers to PCA.
C4	Service Provider	Worksafe has inspected our Paint Plus program and insists that we need WHMIS labelling and SDS's for all categories of the program. They do not agree that PCA or the depots are exempt for the waste stream reason; in fact, they are very clear about storage compatibility and WHMIS requirements for the Paint Plus program. Will you be able to provide WHMIS labelling and SDS's for all Product Care Paint Plus depots to be in compliance with Worksafe BC? As you can imagine it is an onerous task to research all product hazards and then produce correct signage at the depot expense.	The Program is in contact with Worksafe BC to discuss the issue and hopefully be able to come to a resolution soon.

6. COLLECTIONS			
Question #	Sector	Question/Comment	Response
C5	Service Provider	Issue: Regulatory Framework. Impact: Lack of clearly defined process within the Regulation to create a framework to engage consistently with collectors regarding program financial management. Outcome: Inconsistent contracting and eroding economics for some stakeholders as handling fees lag inflation; uncertainty for collectors and industry; higher costs for all. Recommendation: Collaborate with progressive collectors and Ministry to define a reasonable backdrop process to resolve disputes that can be embedded in a regulatory amendment.	The Program is not considering any changes to the collection site compensation model at this time. The Program employs a volume-based compensation model that rewards collection sites based on the amount of Program Product collected, which has historically increased year over year. The approach for setting compensation for Program service providers is a business decision addressed outside the scope of the Program Plan.
C6	First Nations	Identification of collection sites: We are definitely really happy that PCA include first nation collection sites or registered first nation collection sites but it would be great if it was indicate in your documents.	The Program Plan has been amended to reference First Nations collections sites as a separate category.
C7	Local Government	The compensation provided to collection sites is not regularly reviewed to consider rising rent, labour and utility costs. Can you commit to consultation with collection sites on the offered compensation every 3-5 years?	Compensation rates are a business-to-business decision falling outside the scope of the Program Plan. PCA generally uses a volume-based approach to compensate collection sites. The more Program Product collected, the greater the amount of compensation. In general, collection volumes, and hence compensation, have increased year over year.
C8	Local Government	The Plan uses the qualifier “where feasible” for a number of activities and actions that may be undertaken by the program. Recommend the Program identify criteria to define ‘feasibility’ so that stakeholders may make commentary on the reasonableness of the Plan’s approach.	Factors considered in evaluating feasibility of an activity/action include, but are not limited to, economics, level of stakeholder cooperation, timing and a host of other considerations. In each instance, the criteria and thresholds applied will vary depending on the specific activity/action.

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

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

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

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

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

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

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

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

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

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

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

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

9. MANAGEMENT OF ENVIRONMENTAL IMPACTS			
Question #	Sector	Question/Comment	Response
E1	Service Provider	Has Paint Exchange has been renamed as Paint Reuse?	Last year, the Paint Exchange program went through a rebranding process and we renamed it the Paint ReUse. The intention is to have a name that better reflects the purpose of the program which is to have the consumers pick up leftover paint at a collection site at no cost and use the paint.
E2	Local Government	To compliment regional and municipal zero waste goals, City staff encourage Product Care to include in the plan a long term goal of zero paint and HHW -related waste to landfills and incinerators. To this end, it's recommended that Product Care include an action in the plan to complete a study on how to measure performance towards zero waste to disposal facilities, and develop interim disposal reduction targets.	The purpose of the program is to minimize the amount of product left over by consumers, and collect as much of the unwanted products as possible to keep them out of landfills and waterways. We do not consider that a separate target or study relating to disposal facilities will be useful.
E3	Regional District	Page 16 table 4: The way it is laid out is confusing. Containers at top and bottom is confusing. I was not processing it. Maybe a simpler way to present the information.	The table has been modified to make the presentation of the information clearer.

GENERAL			
Question #	Sector	Question/Comment	Response
G1	First Nations	I really appreciate the PCA administration of this program. I had the pleasure to take 6 of our first nation people to your new Delta plant as part of the Swana level 2 training. The new plant is very impressive, everything is done in an environmental manner, so congratulation on that.	Thank you for the positive feedback.
G2	Regional District	The Program has been highly effective at collecting and managing residual paint and household hazardous wastes in BC. The Program should also be commended for two initiatives: - The Paint Exchange program which gives away reusable paint, at no charge. - The B.U.D. promotion, which encourages consumers to avoid waste by only buying what they can use.	Thank you for the positive feedback. PCA strives to operate effective and efficient programs.
G3	Industry	Generally cleaning up wording in the document: As this document will be the “go to” document to determine what is in and what is out, for communications on the website and as reference materials for many stakeholders, our members suggest additional cleanup and clarifications are needed. In addition to definitions, members point out examples such as: if quoting the BC Regulations, quote all of the relevant regulations; otherwise, readers may be confused; if explaining something such as what paints are not included as paint, but may be as pesticides, this needs to be clear and unambiguous	The Program Plan has been reviewed in light of this comment to ensure information presented is clear and complete.