SASKATCHEWAN HOUSEHOLD HAZARDOUS WASTE PRODUCT STEWARDSHIP PROGRAM PLAN

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For submission to:
Saskatchewan Ministry of Environment

Submitted by:
Product Care Association of Canada

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List of Acronyms

Acronym	
CRM	Customer Relationship Management
EHF	Environmental Handling Fees
GHG	Greenhouse Gas
HHW	Household Hazardous Waste

1 Introduction

On June 26, 2019, the Province of Saskatchewan enacted The Household Hazardous Waste Products Stewardship Regulations ("Regulations").

The Saskatchewan Household Hazardous Waste Stewardship Program Plan ("Program Plan") has been prepared by Product Care Association of Canada ("Product Care") pursuant to the requirements of the Regulations on behalf of Product Care's current and future members who are obligated under the Regulations as first sellers of the designated products. Prior to submission of this Program Plan, Product Care conducted a webinar to informed industry members and associated trade associations, of the following:

- The requirements of the Regulations,
- Obligations of first sellers,
- Key elements of Product Care's proposed Program Plan

Comments and feedback were considered and incorporated accordingly.

The Regulations define a "first seller" as a person who:

- is a manufacturer, distributor, owner or licensee of intellectual property rights in household hazardous products that are sold, offered for sale or otherwise distributed into or in Saskatchewan;
- is a vendor of household hazardous products outside of Saskatchewan and who, as an ordinary part of the vendor's business, solicits and sells household hazardous products to consumers in Saskatchewan;
- imports household hazardous products into Saskatchewan for resale in Saskatchewan; or
- purchases household hazardous products outside of Saskatchewan for use in business or institutional operations in Saskatchewan.

The Saskatchewan Household Hazardous Waste (HHW) Stewardship Program ("Program") will be managed by Product Care to facilitate the collection, transportation, recycling, treatment, and safe disposal, of HHW products listed in Section 3 of the Program Plan.

2 Stewardship Organization and Management

Product Care is a federally-incorporated, not-for-profit industry association that manages product stewardship programs for paint, household hazardous and special waste on behalf of its members

across Canada. Product Care was established as an organization to allow its members to meet their obligations under applicable extended producer responsibility legislation. Product Care is incorporated under the *Canada Not-for-Profit Corporations Act*. Product Care operates in accordance with the Articles and Bylaws filed with Industry Canada.

Product Care operates stewardship programs for paint, lighting products, smoke and CO alarms and currently manages the HHW Stewardship Programs in British Columbia, Manitoba and Ontario, as well as the Waste Paint Product Management Program in Saskatchewan.

2.1 Board of Directors

Product Care is governed by a board of directors, comprised of 11 board members representing four membership sectors (Paint Products, Lighting and Alarms Products, Retail and Other Products). The board members are elected at the annual general meeting of the Product Care members, for a 2-year term. Six board positions are up for election in one year, and the remaining 5 positions in the following year. Members of the board are usually affiliated with manufacturers, retailers, or trade associations of that particular sector. A current list of Product Care's Board of Directors is available on Product Care's website (productcare.org).

The board provides oversight of all Product Care programs and ensures that the programs comply with regulatory obligations and respond to industry needs.

The stewards and first sellers of HHW products included in the Saskatchewan HHW program will have representation on the Product Care board through both the Retail and Other Products sector board positions. In addition, many of the paint sector members also sell other products that become HHW at the end of life.

Members may provide feedback and comments related to the program either to Product Care staff or communicate directly to the board member representing their sector. Product Care communicates any significant developments to its' members and relevant trade associations through notices and webinars/conference calls. The program's annual report will be available on Product Care's website.

2.2 Advisory Committee

Section 5(2)(c) of the Regulations requires the formation of an advisory committee. Product Care has an existing advisory committee for the Saskatchewan Paint Stewardship Program. As there will be significant overlap between paint and HHW stakeholders and for paint and HHW program operations, Product Care intends to expand the existing paint advisory committee to also serve as the HHW

Program Advisory Committee. The members of the Saskatchewan Paint Advisory Committee have expressed their support of the expansion of the advisory committee to include the HHW program.

The Paint/HHW Advisory Committee will include representatives from:

a. Paint and HHW industry
b. Saskatchewan NGOs involved in recycling
c. Saskatchewan Local government
d. Saskatchewan Ministry of Environment (SK MoE)
e. Other stakeholders

The advisory committee will serve as a forum for the exchange of information and the identification and discussion of issues. The committee will provide an opportunity for input from the local, government and industry perspective, as well as other stakeholders and help guide the operation of the Saskatchewan Paint and HHW programs. The Saskatchewan Paint/HHW Advisory Committee will operate according to the existing terms of reference of the committee, with modification as needed. Recommendations from the Saskatchewan Advisory Committee will be taken under consideration by Product Care management and put before the Product Care board of directors as appropriate.

2.3 Collaboration with Other Product Stewardship Programs

Product Care will explore possibilities of collaborating with other product stewardship programs with respect to the coordination of collection service and the handling of other program/non-program products to maximize public convenience and program efficiencies. However, due to the hazardous nature of HHW products, options for operational efficiencies may be limited. Product Care will maintain communications with other programs such as Call2Recycle, SARRC and others, in order to identify synergies and resolve any issues that may arise.

3 Program Products

3.1 Products Accepted

Pursuant to Table 1 of the Regulations, Product Care will manage the following HHW products (“Program Products”):

Table 1: HHW Products

Category Name	Description of Included Devices, Equipment, Material, Products or Substances
Waste Household Hazardous Materials	Devices, equipment, material, products and substances that meet the criteria for waste household hazardous materials set out in the CSA Standard Z752-03 Definition of Household Hazardous Waste, including equipment, material, products and substances that meet the criteria for: • Flammable materials; • Corrosive materials; • Physically hazardous materials, including explosives, but not including ammunition; • Toxic materials; or • Environmentally hazardous materials including those materials that meet the criteria of being “toxic” and either "persistent" or "bio accumulative" as those terms are described in Clauses 7.6.2.2 to 7.6.2.4 of that Standard.
Pesticides[1]	Control products as defined and registered pursuant to the *Pest Control Products Act* (Canada) that: • are required to be labelled with the product class designation “Domestic”; and • display on the label the symbol shown in Schedule III of the *Pest Control Products Regulations* (Canada) for the signal word “Poison” combined with the signal words “Danger”, “Warning” or “Caution” represented by the skull and crossbones surrounded by an octagon, diamond or inverted triangle as the case may be, but not including unpackaged products or products not ordinarily sold to, used, or purchased by a consumer without repackaging.

[1] The definition of “pesticide” is not harmonized with the definitions applied in British Columbia and Manitoba. Saskatchewan does not have exclusions for insect repellents, sanitizers, disinfectants, and pet products.

Detailed Product Category Definitions

The Regulations define HHW with reference to the CSA Standard Z752-03 ("CSA Standard"). The following section provides details regarding the Program Products captured under each of the product categories. Each section provides an example of included and excluded products using the definitions provided in the Appendix to the Regulations (Table 1) and the CSA Standard, as applicable.[2] Where there is a discrepancy between the definitions in this Program Plan (not including container sizes) and the CSA Standard, the CSA Standard prevails. In all cases, with the exception of pesticides and lighting products, the list of included products is harmonized with the Manitoba Household Hazardous Waste Program.

According to the CSA Standard, products referenced in the HHW category description are for "household" and "domestic" use only. Accordingly, no products intended for industrial, commercial or institutional use are included in the Program.

Table 2 below describes included and excluded HHW products based on the Appendix to the Regulations and the CSA Standard.

Table 2: HHW Products Included and Excluded

Subcategory	Included	Excluded
Flammable materials	Flammable liquids that have a flash point under 37.8°C; have a fire point or contain water-immiscible liquids with a flash point under 37.8°C Includes waste gasoline In containers not exceeding 10L capacity, except for gasoline: 25L	Non-liquid flammable materials Wine and distilled spirit beverages Cosmetic and beauty products Drugs, medicines and other health products Gasoline not returned in an approved container
Corrosive materials	pH ≤1 or ≥13. A material with a pH >1 and ≤3, or a pH ≥11 and <13,	

[2] The CSA Standard and associated product can be accessed at http://www.csagroup.org/

Subcategory	Included	Excluded
	may be included if acid reserve or alkali reserve meet test criteria Or if classified under TDGR as class 8 Maximum container size 10L	
Physically hazardous materials	Compressed gas fuel cylinders such as welding fuel, camping cylinders, butane cylinders, less than 5kg	Class 1 explosives[3] (including ammunition), flares Medical sharps Refillable propane cylinders
Toxic materials	Vapour LC50 under 2500 mg/m3and saturated vapour over 0.4 times the LC50 Dusts and mists with LC50 equal to or under 2500 mg/m3 liquids with a LD50 under 1000 mg/kg	Mercury switches, products already captured in pesticide category
Environmentally hazardous materials, including those materials that meet the criteria of being "toxic", and either "persistent" or "bio-accumulative" as those terms are described in Clauses	Not Determined[4]	

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

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

Subcategory	Included	Excluded
7.6.2.2. to 7.6.2.4. of that Standard.		
Pesticides	Any consumer product that: Has the poisonous (skull & cross bones) symbol; Pest Control Product (PCP) number; and The word “Domestic” and “Danger” on the label. Maximum container size: 10L	Pesticides which do not have all of the poisonous symbol, the PCP number and the word “domestic” on the label Pesticides for industrial, commercial or agricultural use

There may be some products that fall under multiple product categories. To clarify what product category a product falls under, the program employs a product classification hierarchy. If a product is described under more than one category, it is classified under the first applicable category (see

Table 3). Wherever possible, the program will strive to harmonize its categories with the Manitoba HHW Program.

Table 3: Product Classification Hierarchy

Product Classification Hierarchy
Physically hazardous materials
Pesticides
Paints
Flammables
Corrosives
Toxics
Environmentally hazardous materials

If a product falls within more than one product category, it is generally classified based on the product's intended use, Transportation of Dangerous Goods classification, or disposal method. For example, oil-based paint may be flammable, but is classified as paint. Antifouling paint, registered and labelled as a pesticide, is processed as a pesticide and therefore is categorized as a pesticide.

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

Decision Tree

The Program will provide a Product Decision Tree to assist obligated first sellers and others, similar to Decision Trees used in the Manitoba and British Columbia HHW programs for similar products (see Appendix A). The Decision Tree was developed with input from manufacturers, retailers, distributors and relevant trade associations and is subject to change. The Program will notify the Saskatchewan Ministry of Environment, prior to any changes to the Decision Tree.

3.2 Products Not Accepted

The Program will not accept other product categories identified under the Regulations, including rechargeable batteries or other batteries.

With respect to Program Products, the Program will not accept:

a. Products that are unlabeled or cannot be identified;
b. Products that are leaking or improperly sealed;
c. Commercial or industrial products; and
d. Cosmetic, health and beauty products.

Empty HHW Containers

HHW product containers are designated under the Regulation, unless they are already covered under another regulation.

"household hazardous products" means any devices, equipment, materials, products or substances that are in one of the categories set out in Table 1 of the Appendix and includes the container in which the household hazardous products are supplied, but does not include any products or containers to which another stewardship program pursuant to the Act applies;

The principal objective of the Program is to minimize the environmental impact associated with end-of- life HHW which will be returned to the program in the original container. The program will manage both the residual HHW and the original container in which the residual HHW is returned.

Options for managing the container after the residual HHW has been removed are very limited. Attempting to clean the residuals from the containers, results in more hazardous waste being generated and needing to be managed. Unlike the packaging of other stewarded products, packaging of HHW products is low volumes, variable as to type, colour and composition and contains or is contaminated by HHW residuals, which generally makes options such as recycling or energy recovery , not available or financially viable.

4 Collection and Transportation

4.1 Collection System

Unlike many other stewarded products, HHW products have unique characteristics that require special handling and are subject to various additional federal, provincial and local regulations and by-laws, such as the Dangerous Goods Transportation Act. These requirements limit the service provider options available to the Program for the collection and transportation of HHW products.

There are currently no permanent facilities in the province for the collection of HHW products. A limited number of local governments host annual HHW collection events and a few, such as Saskatoon and Regina, schedule multiple one-day HHW collection events.

The intention of the Program is to develop a network of permanent collection facilities to provide a convenient, cost effective program for the residents of Saskatchewan. In order to achieve this, it is anticipated that the collection system be a combination of permanent collection facilities in approximately 12-19 communities, combined with some collection events. Product Care does not directly own or manage collection sites, but will contract with local governments, organizations and private entities that meet site and compliance requirements.

Additional time will be required to develop permanent collection infrastructure compliant with applicable regulatory requirements, compared to jurisdictions with existing infrastructure. Due to the number of variables beyond its control, the program is unable to commit to a timeline. In similar circumstances, Product Care was able to implement 15 permanent collection facilities for the Manitoba HHW program over a 5-year period.

The Program will require significant lead time, following Program Plan approval, for the development of the collection system, including any necessary local government approvals, and to identify and engage service providers such as transporters etc. The duration of the implementation period will depend upon the level of interest and priority of the communities, availability and suitability of collection sites/infrastructure, and the regulatory approval process.

The program intends to strategically develop the permanent collection sites to maximize the number of Saskatchewan residents served at a reasonable cost. Expected volumes, demand for service, availability of existing collection infrastructure and economics will be factors for determining the need for permanent collection sites versus collection events.

The Program will enter into contracts with each permanent collection site, covering their respective roles and responsibilities. Contracted sites will be provided with Product Care's collection site guidelines covering:

- Collection site standards
- Program Products information
- Reporting requirements
- Other operational procedures

Depending on the timing of this program plan approval and for reasons noted, the Program will rely initially on collection events to provide service while permanent collection sites are developed. The

program will initially target communities that held HHW collection events (13), in the previous year, subject to the willingness of those communities, and the seasonality and capacity of services providers and then will expand collection event services, as required.

From past experience the need for HHW services by some communities is limited, as demonstrated by minimal collection volumes. Product Care reserves the right to adjust the number and location of collection events based on a number of factors including demand.

Collection events will be conducted in partnership with local governments who will have the option to allow the acceptance of non-Program products at their expense.

The program will also work to provide service to rural, remote and indigenous communities, provided that there is interest from the community and reasonable options are available. Based on synergies achieved in other jurisdictions, Product Care will look for opportunities to coordinate the service to those communities with other stewardship programs.

The Program will assess the accessibility of the collection site network on an ongoing basis as a continuous improvement measure. The collection network will be open to all residents of Saskatchewan, subject to local government restrictions, if any.

There will be no charge to the public for the drop-off of Program Products at events or collection sites. The Program may also provide direct pick-up service, free of charge, for large volume generators.

4.2 Transportation and Processing

The transport and processing of HHW products are subject to additional regulatory requirements due to the hazardous nature of some of the products. Product Care will contract with third party transporter(s) to transport collection containers between collection sites/collection events and processing facilities. The transporter is responsible for picking up full collection containers from collection sites and supplying empty collection containers in return. Manifests are not required for transporting collected materials within the province, but are necessary for interprovincial shipments per federal regulations. Any contracted service provider for transportation and or processing will be required to meet all applicable federal, provincial and municipal regulatory requirements.

5 Product Management

The objective of the Program is to minimize the improper disposal of Program Products by providing an accessible collection program and ensuring that the collected materials are reused, recycled or treated or disposed of in an environmentally responsible manner. Product Care contracts with qualified service providers to process Program Products. Processors are selected based on a number of factors,

including regulatory compliance, location of operations, processing capacity, processing methods, competitiveness, downstream markets and conformity with Product Care requirements. All processors are required to comply with federal and provincial regulatory requirements, as well as Product Care's requirements.

Product Care's end-of-life management protocol employs the following hierarchy to minimize impacts on the environment: reduction, reuse, recycle, and disposal in an environmentally responsible manner. Due to the wide range in composition and properties of HHW products, different management methods are used for different products. The Program intends to use the product management options, as described in this section, subject to factors such as availability of options, economic feasibility and market conditions.

Product Care encourages consumers to buy the right amount of consumable products for their needs in order to reduce waste. The "BUD" Rule is Product Care's primary message, where consumers are encouraged to:

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

5.1 Flammable Materials

Given the nature and mixed composition of flammable materials, it is not economically viable or feasible to reuse or recycle flammable liquids. Instead, leftover flammable materials will be blended and sent for energy recovery.

5.2 Corrosive Materials

Corrosive materials will be neutralized, and the resulting water managed appropriately, dependent on its residual properties and technologies available. Corrosive aerosols will either be evacuated with propellants absorbed by activated carbon and the corrosive liquids neutralized, or directly incinerated.

5.3 Toxic Materials

Toxic materials will either be sent for fuel blending and energy recovery or incinerated at high temperature in a government regulated and permitted incinerator.

5.4 Pesticides

Pesticides will be incinerated at licensed facilities and at temperatures high enough to avoid creating hazardous by-products. Pesticide aerosols will either be evacuated, propellants absorbed by activated carbon, and the residual pesticides are sent for incineration or directly incinerated.

5.5 Physically Hazardous Material (Fuel Cylinders)

Fuel from fuel cylinders is either sent for energy recovery or is recaptured and used as fuel.

5.6 Containers

HHW products are typically packed in metal or plastic containers, and in some cases, glass. The specific types of containers (e.g. plastics) vary greatly (type of plastic, colour, etc.) even within a single product category. In many cases, this makes it not possible to recycle them. In some cases, the cleaning of the product residue in the container generates more hazardous waste. Containers may be shipped to downstream recyclers once they have been emptied of their contents. Where it is not viable or feasible to recycle metal, plastic or glass containers (e.g. pesticides, toxics etc.), they are sent to landfill.

6 Program Funding

The Program is funded by environmental handling fees (EHFs) remitted to Product Care by the Program members. Members submit EHFs to the Program based on the number of units of program products sold in Saskatchewan. There is no charge to drop off Program Products at the point of collection.

6.1 EHF Rates

EHFs are set through the Program budgeting process and are reviewed and approved by Product Care's Board of Directors. EHFs are used only for Program purposes including, but not limited to, communications/public education, administration, collection, transportation, processing, and a reserve fund. EHFs may be adjusted over time to ensure the financial sustainability of the Program and fiscal responsibility. EHFs will be applied based on container size for flammable materials, corrosive materials, toxic materials and pesticides. EHFs for physically hazardous materials will be applied on a per unit basis. Product Care reserves the right to change methodology for the application of EHFs. Product Care will normally provide a minimum of 90 days' notice of fee changes to members and will provide advance notice of fee changes to the Saskatchewan Ministry of Environment.

6.2 Fee Visibility

Retailers may recover the EHFs remitted to Product Care as a separate fee at the showing a visible EHF at the point of sale. A visible EHF is an effective and efficient way to raise program awareness among consumers. Fee visibility simplifies financial administration for all parts of the distribution chain, facilitates national pricing programs, contributes to the maintenance of a “level playing field” and avoids resale mark ups on the EHF. Visible fees are not subject to provincial sales tax in Saskatchewan.

With fee visibility comes the need to properly inform consumers that the charge is an industry fee, not a government tax. A key Program public education message will be that the EHF is imposed and collected by industry, not the government, and may be listed separately for consumer awareness.

7 Quality Control and Assurance

7.1 Membership

Product Care has notified members of its HHW programs in British Columbia, Manitoba and Ontario of the enactment of the Regulations and invited them to join the Program if they are first sellers of designated products. Product Care membership is open to all obligated first sellers. Product Care will also actively search for, identify and recruit other first sellers of designated HHW products, informing them of the regulatory requirements, in order to maintain a level-playing field for all first sellers. Product care will inform the Saskatchewan MoE, for enforcement purposes, of any potentially obligated first seller, who either does not respond to Product Care’s recruitment efforts or chooses to not join the program. Also any company whose membership in the Product Care HHW program is terminated, but continues to supply designated products shall be referred to Saskatchewan MoE for enforcement.

Product Care utilizes a cloud-based customer relationship management (CRM) software platform to manage the registration, product supply and EHF reporting by program members.

7.2 Collection

Product Care utilizes a database tracking and control system to record and track HHW products that are collected and managed through the Program.

7.3 Program Funding

Current members of Product Care report sales and remit EHFs via an online reporting system. First sellers will be able to register on the system following approval of the Program Plan. The Program

maintains confidentiality of its members' product formulation, design information and sales data. Only aggregated sales data is used in public reports.

Product Care ensures financial accountability by maintaining separate accounts for the revenue and expenses of the Program. As part of its risk management system, the Program maintains environmental insurance and a reserve fund. The purpose of the reserve fund is to prepare the Program for unexpected costs or to cover expenses should revenues be less than projected. Product Care's Board of Directors determines the limit of the reserve fund.

7.4 Lloydminster

The City of Lloydminster straddles the border between Alberta and Saskatchewan. Alberta Resource Management Authority (ARMA), the province of Alberta, and the City of Lloydminster have been providing service for HHW collection in Lloydminster. Consistent with the approach for managing paint stewardship in Lloydminster, ARMA has indicated that they will continue to support the annual HHW roundups and continue to take responsibility for HHW stewardship in the City. In addition, ARMA will be expanding to collect additional products under its paint stewardship program that includes some HHW products covered under the Regulations. Consequently, Product Care will not hold collection events in Lloydminster, nor will EHFs be collected on any HHW products sold into Lloydminster.

8 Public Education and Awareness

The Program will develop an integrated marketing communications strategy to inform consumers of the Program, the location of collection sites or events, and how to manage products in a safe manner.

8.1 Communication Tactics and Channels

The Program will use a number of tactics to raise consumer awareness of the Program, including:

- Website – The Program website includes information on what items can be returned and where—using the map-based collection site finder. Each collection site and collection event listing provides location, operating hours and any special instructions particular to that location/event.
- Program toll free number – The Program maintains a toll free number service for consumers to contact the Program during business hours and obtain information about disposing of Program Products.
- Point of return – All participating collection sites are provided with program signage to display, as well as counter cards or brochures to distribute to consumers.

- Annual report – Annual reports are posted on Product Care's website.
- Earned media, digital and traditional advertising – The Program will also use earned media (news releases, op-eds, etc.), targeted social media posts/Google display ads, and print advertising as needed.
- Other – Additional methods of communications identified through market research that is deemed effective for the Program.

The Program's initial focus will be on developing and establishing the collection system, followed by public outreach and public education to make consumers aware of the recycling services. Once a reasonable permanent collection system has been established, the program will conduct a consumer awareness survey.

8.2 Partnerships

Product Care is continuously exploring partnerships with organizations that already communicate with consumers about recycling. Some possible avenues include:

- Point of sale – including shelf talkers, counter cards, consumer brochures or program posters which would be made continuously available to retailers for display and distribution to consumers.
- Local governments – partnership opportunities with local governments to inform residents of the availability of the Program, which may include:
    - Participation in community collection events;
    - Links from local government websites to Program website;
    - Inclusion of program information in recycling-specific web pages;
    - Inclusion of program information with local government communications to households;
    - Inclusion of links on other stewardship agency websites; and
    - Links to Saskatchewan Waste Reduction Council.

9 Greenhouse Gas (GHG) Emissions

The Program is committed to minimize environmental impacts during the collection, transportation, and final treatment of household hazardous waste products where feasible. As part of this commitment, Product Care takes GHG emissions into consideration during the development of the collection, transportation and final treatment methods of products. Specific initiatives that will be implemented to minimize GHG emissions include:

- Consideration of logistics planning to ensure efficiency and minimizing GHG generation;

- Leveraging existing facilities to minimize generation of GHG from construction activities of new collection sites;
- Maximizing transportation load management, utilizing milk-runs where feasible;
- Using reusable collection containers where possible;
- Coordinating with local governments to operate collection events for Non-Program material on the same dates with the same service providers, where possible.

HHW products vary greatly, with different formulations and concentrations, using a wide variety of raw materials, making it difficult and cost prohibitive to develop a reasonable means of tracking and reporting on GHG emissions and with little accuracy.

10 Reporting Commitments

In accordance with Section 9 of the Regulations, Product Care will submit an annual report to the Ministry. The report will describe the activities of the Program during the reporting period as set out in section 9(3):

a. The amount of household hazardous waste product collected for each subcategory listed in Table 2 of the Program Plan;
b. The amount of household hazardous waste product, by subcategory, diverted to each of the Program's waste management options listed in Section 5 of the Program Plan;
c. The total amount of recycling fees collected to fund the Program in Saskatchewan;
d. The amount spent to operate the Program in Saskatchewan;
e. The amount of recycling incentives paid out, if any;
f. The costs incurred to administer the Program; and
g. The amount spent on public education or public awareness and communication.
h. The number of collection sites established and the number of collection events held, including the location (city/town).

Note that it may not be possible to report out on each subcategory such as pesticides and toxics as the collection and management of dangerous goods/hazardous products are governed by Transportation of Dangerous Goods Regulations, which is driven by hazard class. As an example both toxics and pesticides are classified as class 6 and will be collected together, classified, handled, transported and managed as one product class.

11 Review of Program Plan

Pursuant to Section (6) of the Regulations, Product Care will review the Program Plan every 5 years after the date of Program Plan approval. A comprehensive public and stakeholder consultation will be

undertaken at that time to determine if any amendments to the Program are required. Any proposed amendments arising from the review will be submitted to the Ministry for approval.

Appendix A: Saskatchewan Product Decision Tree

This Decision Tree is intended to be used to determine if products are included in the Saskatchewan HHW flammable, corrosive, and toxic categories ONLY. Please note that there may be differences in the product classification criteria under these categories in each of the provincial HHW stewardship programs. Therefore, the status of a product under one provincial stewardship program may not reflect its status under another provincial program.

STEP 1: Is the product listed below?

If yes, the product is **NOT** a designated material under the program and is excluded from the program.

If no, the product may be included in the program.[5] *Proceed to Step 2.*

- Commercial, industrial, or agricultural products
- Caulking compounds
- Lead acid batteries
- Oil / Antifreeze
- Powder forms (solid) of masonry products, cement, grout, mortar, plaster of Paris
- Mercury switches
- Fertilizer
- Wine and distilled spirits
- Drugs and medicines
- Diesel
- Medical sharps
- Cosmetics
- Refillable propane cylinders
- Ammunition
- Product has a WHMIS or GHS label (symbol contained in red diamond)
- Flammable liquids, corrosives or toxics sold in containers greater than 10 litres or greater than 680 grams/24 ounces for aerosols

[5] Products listed below are accepted for collection, but are fee exempt and do not need to be reported to Product Care Association (PCA). This is subject to change by PCA.

a. Products under the flammables and corrosive categories that are intended for use down the drain during its primary intended use, such as bleach and drain cleaners.
b. Concrete products such as mortar mixes
c. Windshield washer fluids

STEP 2: Classify the product

The Program employs a classification hierarchy to classify products. If a product is described under more than one category, it is classified under the first applicable category according to the product's intended use, Transportation of Dangerous Goods classification, or disposal method (see Table 1).

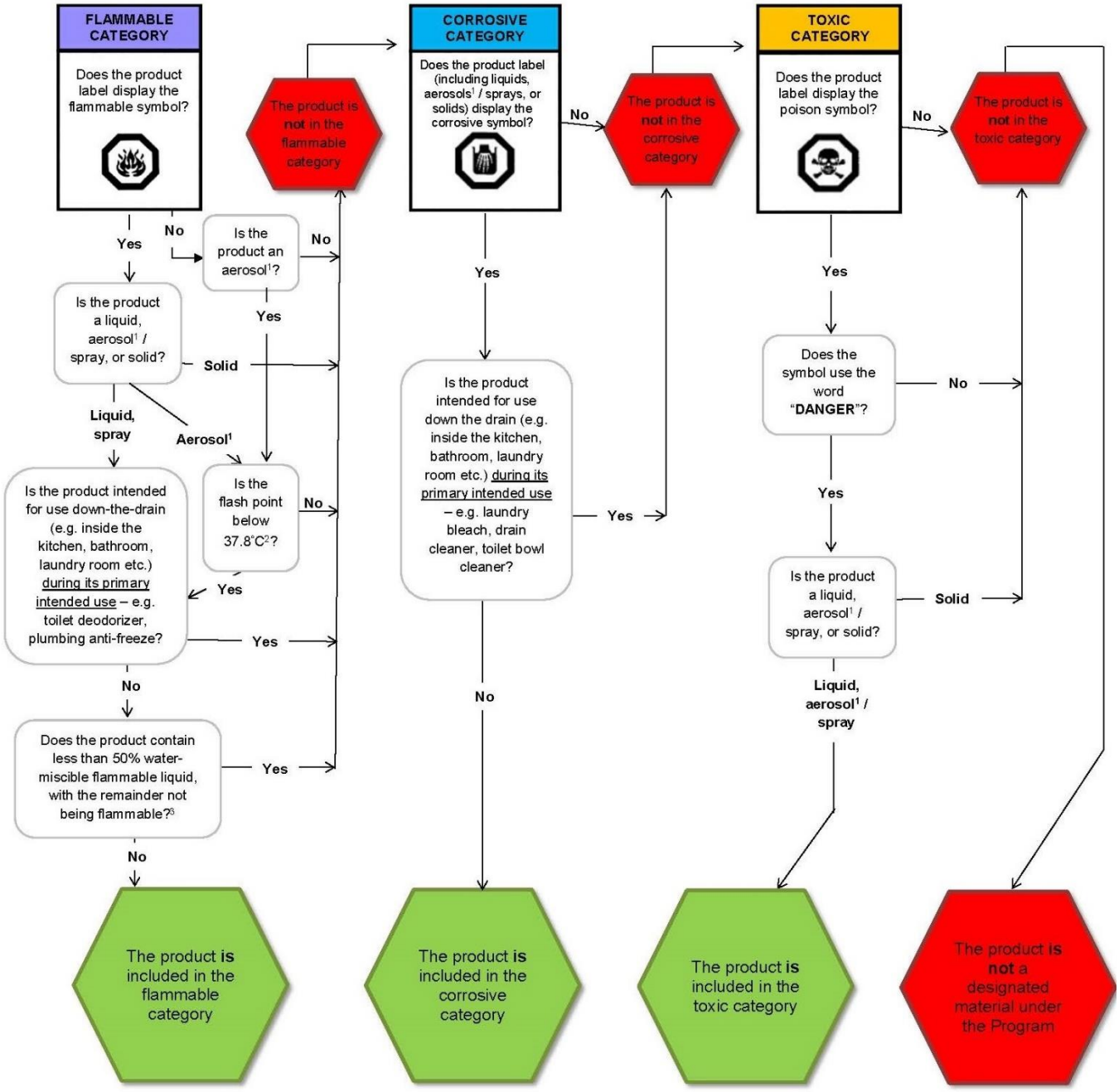
Table 1: Product Classification Hierarchy
Physically hazardous materials
Pesticides
Paints
Flammables
Corrosives
Toxics
Environmentally hazardous materials

Apply SK HHW Decision Tree if the product is not classified in a category listed above

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

If the product may be a flammable, corrosive or toxic, *please proceed to Step 3.*

STEP 3: Follow the Decision Tree starting at the flammable category box.



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

2. Flash point per CSA Standard Z752-03, September 2003 titled: Definition of Household Hazardous Waste.

3. Products containing less than 50% water-miscible flammable liquid by volume with the remainder of the product not being flammable are excluded (with reference to the *National Fire Code* of Canada, 1990, as published by the National Research Council of Canada and cited in CSA Standard Z752-03, September 2003).