



BRITISH COLUMBIA HAZARDOUS & SPECIAL PRODUCTS EXTENDED PRODUCER RESPONSIBILITY PROGRAM PLAN



Submitted to: Director, Extended Producer Responsibility
Environmental Standards Branch
BC Ministry of Environment and Parks

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Submitted by: Product Care Association of Canada



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Glossary

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

Term	Definition
Program Plan	Hazardous and Special Products Extended Producer Responsibility Program Plan
Regulation	BC Recycling Regulation, BC Reg. 449/2004, as amended.
Program	Hazardous and Special Products Extended Producer Responsibility Program
Program Product	Designated products under Schedule 2 of the BC Recycling Regulation that are included in the Program as defined under section 4 of the Program Plan.
Product Care	Product Care Association of Canada
CCV	Container capacity volume
EHF	Environmental handling fee
ELC	Equivalent litres of containers
EPR	Extended producer responsibility
HHW	Household hazardous waste
HSP	Hazardous and Special Products
NPP	Non-program product
PCB	Polychlorinated biphenyls
IZWTAG	Indigenous Zero Waste Technical Advisory Group
FNRI	First Nation Recycling Initiative
LVG	Large Volume Generator (An entity that is registered with Product Care to receive complimentary pick-up of large numbers of Program Product.)
BCMoEP	British Columbia Ministry of Environment & Parks
SABC	Stewardship Agencies of British Columbia

1 INTRODUCTION

This amended Hazardous and Special Products (“HSP”) Extended Producer Responsibility Program Plan (“Program Plan”), formerly known as the Paint and Household Hazardous Waste Program Plan, is submitted to the British Columbia Ministry of Environment and Parks (“BCMoEP”) by Product Care Association of Canada (“Product Care”) on behalf of the Producers of designated hazardous and special products sold in British Columbia who are members of Product Care, pursuant to the requirements under section 6 of the BC Recycling Regulation (“Regulation”).¹

This Program Plan amends the previously approved BC Paint and Household Hazardous Waste Extended Producer Responsibility Program Plan, approved by BCMoEP on March 13, 2026, by expanding the scope of products managed under the Program. The BC Paint and Household Hazardous Waste Extended Producer Responsibility Program has been in operation since 1994 for paint products and since 1997 for household hazardous waste (“HHW”) products.

As part of this amendment, the Program name has been updated to the Hazardous and Special Products Extended Producer Responsibility Program to reflect the expanded product scope resulting from the October 27, 2025, amendments to the BC Recycling Regulation, including newly designated canister and automotive product categories.

In accordance with the timelines established under the Regulation for newly designated products, this amended Program Plan is being submitted by June 30, 2026. The Regulation establishes implementation dates of February 1, 2027, for automotive products and April 1, 2027, for canister products. Implementation of the newly designated product categories under this Program Plan remains subject to timely approval by the BCMoEP. Where approval occurs close to the applicable implementation dates, Product Care may require a minimum of 90 days following Ministry approval to prepare for operational readiness.

This submission is not a re-filing of a new program plan, but rather an amendment focused on integrating newly designated product categories into the existing Program within the compressed timelines established under the amended Regulation. The expanded product scope will be incorporated into the previous HHW product category and renamed as HSP.

Except where explicitly amended through this submission, the provisions of the previously approved Program Plan remain unchanged. Existing Program elements, including governance, producer obligations, cost management, accessibility standards, consumer awareness strategy, and performance measurement approach, continue to apply to where relevant to the expanded product scope.

¹ British Columbia Ministry of Environment and Climate Change Strategy, BC Recycling Regulation, BC Reg. 449/2004, http://www.bclaws.ca/civix/document/id/complete/statreg/449_2004.

All sections of the draft Program Plan have been reviewed and updated, as appropriate, to reflect the expanded product scope; however, for ease of stakeholder review, sections with no substantive changes from the original paint & HHW program plan have been denoted with “(No Change)”.

The Program will leverage existing infrastructure, service provider relationships, and operational practices to support implementation of the expanded product scope, recognizing that certain limitations such as capacity may exist in the operational system. Implementation of the expanded scope of products will occur progressively following approval of this Plan.

2 DUTY OF PRODUCER

The responsibilities of Producers are defined in the Regulation. 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 [Extended Producer Responsibility Plans] and comply with the approved plan²

Section 1 of 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) if subparagraph (i) does not apply, 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) if subparagraphs (i) and (ii) do not apply, a person who imports the product into British Columbia for sale, distribution or use in a commercial enterprise.

For the purposes of this definition, a person is considered to sell or offer a product for sale by any means, including online, by phone, or by mail (section 2(4)).

² As per the October 27, 2025 [amendments](#), Part 3 of the Recycling Regulation has been updated and now applies only to Producers within the electronic and electrical product category.

3 APPOINTMENT OF STEWARDSHIP AGENCY (NO CHANGE)

The Program is developed, managed, and operated by Product Care, a not-for-profit industry association that manages extended producer responsibility programs across Canada for hazardous and special products on behalf of its members. Product Care was established as an agency to enable its members (i.e., Producers of Program Products) to meet their obligations under provincial extended producer responsibility legislation. Product Care is incorporated under the *Canada Not-for-Profit Corporations Act*³ and is governed by a board of directors, from various membership classes, representing producers, retailers, and trade associations involved in the various programs operated by Product Care. A current list of Product Care's Board of Directors, including their corporate affiliation, membership class and province of residence is available on Product Care's website (productcare.org).

Product Care is governed pursuant to its articles of incorporation and bylaws as well as its corporate governance policies. Any substantive change in legal status of Product Care, such as changing from not-for-profit status, would be consulted on and require membership approval, prior to making the change. The board maintains various standing committees, pursuant to the provisions of its bylaws. Any changes to Product Care's legal status will be referenced in the Program's annual report, if applicable.

The Program has also been supported by Product Care's National HSP/HHW Advisory Committee comprised of industry representatives from various business sectors (manufacturers, retailers, trade associations). The Committee provides guidance, such as support on product definitions, etc. In addition, a provincial advisory committee will be established by Product Care to provide ongoing engagement with key BC stakeholders. The composition and structure of advisory committees is subject to change.

According to section 2 of the Regulation, a Producer must comply with Part 2 of the Regulation in order to sell, offer for sale, distribute or use designated products in a commercial enterprise in BC. Accordingly, each Producer that joins the Program appoints Product Care as its agent to carry out the duties of the Producer imposed by section 2 of the Regulation. In turn, the Program Plan confirms the duties that Product Care will perform on behalf of each Producer that is a member of the Program and in good standing. Product Care can provide confirmation of a company's membership upon request by the BCMoEP.

The Program is the only approved EPR program for paint, flammable liquids, gasoline, and domestic pesticides waste in the Province. Product Care's members represent the vast majority of the market in British Columbia for designated products. Program membership is open to all Producers, including manufacturers, brand owners, distributors, first importers and retailers of obligated products in BC. Product Care is continuously engaged in identifying and recruiting Producers of Program Product in the

³ A copy of the Act is available at <https://laws.justice.gc.ca/eng/acts/c-7.75/>. Product Care's Letter of Continuance, bylaws and audited financial statements are available on Product Care's website <https://www.productcare.org/members/membership-documents/>.

BC market, and where necessary, notifying the BCMoEP for follow up and enforcement. A current list of Program members that have appointed Product Care as their agent, as well as other member-related information, is available on Product Care's website (www.productcare.org). In addition to member information on the website, Product Care engages with members on an ongoing basis through various channels, such as member meetings, member notifications and member support staff.

Product Care also manages and operates paint and HSP stewardship programs in other provinces. Information on other provincial stewardship programs is available at www.productcare.org.

4 PRODUCTS COVERED UNDER THE EXTENDED PRODUCER RESPONSIBILITY PLAN

4.1 Overview

The Program has historically managed products designated under Schedule 2 of the Regulation within the paint, flammable liquids, gasoline and pesticide product categories under the approved BC Paint and Household Hazardous Waste Program Plan. This amended Program Plan expands the Program scope to include select products within newly designated canister and automotive product categories.

Under this amended Program Plan, the HSP Program manages the following product categories:

- Paint Products
- Hazardous and Special Products ("HSP"), which include:
 - Flammable liquids and gasoline
 - Domestic pesticides
 - Canister products
 - Automotive products

Products included in the Program ("Program Products") and excluded from the Program ("Non-Program Products") are described in the sections below. Product Care maintains a regularly updated list of Program and Non-Program Products on its website (www.productcare.org) Product Care reserves the right to amend the list of Program/Non-program Product at any time.

To assist those in the product supply chain, consumers and other stakeholders with interpreting the complex technical definitions of HSP products in the Regulation, Product Care in consultation with the National HSP/HHW Advisory Committee developed supporting material, such as decision trees and guidelines, to support industry and collection partners

In addition to the Non-Program Products set out below, the following materials are not accepted by the Program due to health and safety concerns to service providers (i.e., collectors, transporters, and processors) associated with handling such materials, the inability to differentiate Program Product from Non-program product ("NPP") and risks associated with contravening regulatory requirements associated with the handling of certain products:

- Bulging containers
- Unidentifiable or unlabelled containers
- Leaking or improperly sealed containers

4.2 Paint Products (No Change)

4.2.1. Paint Products Included in the Program

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

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

The Program accepts and manages the following architectural paints (up to a maximum container size of 25 litres) and all types of aerosol paints (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 Product Care:

- Interior and exterior water-based (e.g., latex, acrylic) and oil-based (e.g., alkyd, enamel)
- 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 paint⁴
- Wood finishing oil
- Melamine, metal and anti-rust paint, stain, and shellac
- Swimming pool paint (single component)
- Stain blocking paint
- Textured paint
- Block fillers and sealers
- Wood, masonry, driveway sealer or water repellent (non-tar based or bitumen based)
- Paint aerosols of all types including automotive, craft and industrial products

The Program also manages the container in which the unwanted paint is contained, as specified in the definition of paint products under Section 9 of Schedule 2 of the Regulation.

⁴ Unless registered under Pest Control Products Act, in which case they are evaluated under the domestic pesticide category (see section 4.3.3 below).

4.2.2 Non-Program Paint Related Products (No Change)

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

- Industrial paints, coatings 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)⁵
- 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 solvents⁶
- 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

4.3 Hazardous and Special Products (Previously Household Hazardous Waste Products)

Hazardous and Special Products (HSP) include product categories requiring specific handling, storage, and end-of-life management due to their chemical or physical characteristics.

The Program has long managed flammable liquids, gasoline, and domestic pesticides as part of its established operations. This amended Program Plan expands the HSP category to include additional products within the newly designated canister and automotive product categories introduced through amendments to the Regulation approved on October 27, 2025.

4.3.1 Solvents and Flammable Liquids (No Change)

Flammable liquids and gasoline have historically been managed under the Program and continue to form part of the HSP Program.

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

⁵ Unless registered under Pest Control Products Act, in which case they are evaluated under the domestic pesticide category (see section 4.3.3 below).

⁶ These products are considered under the solvent & flammable liquids category (see section 4.3.1).

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

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

(b) paint strippers containing methylene chloride, and

(c) containers for the products described in paragraphs (a) and (b).

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

The list of solvent and flammable liquid products accepted by the Program is subject to change by Product Care.

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

While certain windshield washer fluid (“WWF”) and diesel exhaust fluid (“DEF”) products may meet the flammable liquid criteria, WWF and DEF are excluded from the Program scope at this time. Product Care has not received an industry mandate to manage these automotive product categories under the HSP Program. They are anticipated to be managed through another stewardship program.

As noted previously, a Product Classification Decision Tree can be found on our [website](#), to assist members in classifying products under the solvent and flammable liquids category. The Decision Tree is subject to change by Product Care, including to support the incorporation of newly added product categories into the Program.

4.3.2 Gasoline (No Change)

Gasoline has historically been managed under the Program and continues to form part of the HSP Program.

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

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

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

4.3.3 Domestic Pesticides (No Change)

Domestic pesticides have historically been managed under the Program and continue to form part of the HSP Program.

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

(1) Subject to subsection (2), the pesticide product category consists of control products registered under the Pest Control Products Act (Canada) and includes empty containers for those products, that

- (a) are required to show on the label the domestic product class designation, and*
- (b) display on the label the symbol shown in Schedule III of the Pest Control Products Regulation (Canada) for the signal word "**Poison**".*

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

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

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

4.3.4 Non-Program flammable liquids, gasoline and domestic pesticides - related Products

The following is a non-exhaustive list of products that are excluded from the flammable liquids, gasoline, and domestic pesticides category of the Program. Certain products identified below may instead be managed under the other HSP product categories, as noted:

- Commercial, industrial or agricultural products
- Cosmetics, health and beauty aids (aerosols included under the aerosol canister products category)
- Diesel, propane, butane fuels (fuel canisters included under the non-refillable fuel canisters category))
- Compressed gases (some may be included under the canister and automotive products categories)
- Pesticides that do not meet the definition set in [Section 4.3.3](#) of the Plan (e.g., commercial, industrial, agricultural, or ready to use pesticides) (aerosols included under the aerosol canister products category)
- Insect repellents, disinfectants, and pet products (aerosols included under the aerosol canister products category)
- Fertilizers
- Acids, cleaners, bleaches, and other corrosive or toxic materials (some may be included under the canister and automotive products categories)
- Automotive used oil and automotive antifreeze
- Other household chemicals/products (aerosols included under the aerosol canister products category)

For the most up to date list of included flammable liquids, gasoline and domestic pesticides products, please see our [website](#).

4.3.5 Containers associated with flammable liquids, gasoline and domestic pesticides (No Change)

The Regulation designates containers under the solvent and flammable liquids, gasoline and domestic pesticide categories. The Program, however, only manages containers with residuals of unwanted flammable liquids, gasoline, or pesticides. Product Care has not been provided with the mandate by its members to manage already empty containers and therefore does not accept them in the Program.

Containers used for transporting and storing gasoline are sold as empty containers without residuals (i.e. packaging). Therefore, empty gasoline containers are not accepted under the Program.

4.4 Canister Products

Canister products is a newly designated product category under this amended Program. This Program Plan includes product subcategories within the canister category for which Product Care has received producer mandate.

The following canister product subcategories are included as Program Products:

- Pressurised non-refillable:
 - Aerosol canisters;
 - Animal deterrent canisters including bear spray;
 - Canisters containing cleaning agents;
 - Canisters containing sealants and adhesives;
 - Low-pressure spray foam canisters for construction use
 - Fuel canisters;
 - Handheld fire extinguishers

4.4.1 Aerosol Canisters

The Program accepts non-refillable aerosol canisters up to a maximum size of 680 grams (24 ounces), including residual contents and associated containers.

Accepted aerosol canisters include, but are not limited to:

- All automotive aerosols including cleaners, lubricants, coatings, solvents, lubricants and maintenance products
- Personal care aerosols
- Food-grade aerosols
- Craft and hobby aerosols
- Non-automotive lubricant and maintenance aerosols

Aerosol examples include air fresheners, cooking sprays, hairsprays, spray lubricants, brake cleaners, carburetor cleaners, and similar products.

Certain aerosol canisters may also meet the definitions of other regulated product categories under the Regulation, including cleaning, automotive, paint, pesticide, other household products. For the purposes of the Program, aerosol products will be managed under the Aerosol Canisters category where applicable.

4.4.2 Animal Deterrent Canisters

The Program accepts non-refillable aerosol canisters containing animal deterrent agents, including bear spray and similar consumer deterrent products, up to a maximum size of 680 grams (24 ounces), including residual contents and associated containers.

Examples include:

- Bear spray
- Dog and coyote deterrent spray

- Wildlife deterrent aerosols⁷

4.4.3 Fuel Canisters

The Program accepts non-refillable pressurized fuel canisters, cartridges, and cylinders intended for consumer, household, recreational, or outdoor use, up to a maximum size of 680 grams (24 ounces), including residual contents and associated containers.

Accepted fuel types include, but are not limited to:

- Propane
- Butane
- Isobutane
- MAPP and MAP-Pro fuel
- Mixed fuel canisters

Accepted products include portable non-refillable fuel canisters commonly used for camping, cooking, heating, soldering, and similar household or recreational applications.

4.4.4 Canisters Containing Sealants and Adhesives

The Program accepts non-refillable aerosol canisters containing sealants and adhesives, up to a maximum size of 680 grams (24 ounces), including residual contents and associated containers.

4.4.5 Canisters Containing Cleaning Agents

The Program accepts non-refillable aerosol canisters containing cleaning agents, including residual contents and associated containers, up to a maximum size of 680 grams (24 ounces).

Examples include:

- Oven cleaners
- Degreasers
- Disinfectant sprays
- Electronic cleaning aerosols

4.4.6 Handheld Fire Extinguishers

The Program accepts handheld fire extinguishers, including residual contents and associated containers, up to a maximum size of 15 litres.

Foam extinguishers, Class D extinguishers, and extinguishers intended exclusively for industrial, laboratory, institutional, or military applications are excluded from the Program.

4.4.7 Low-Pressure Spray Foam Canisters for Construction Use

The Program accepts non-refillable aerosol spray foam canisters intended for residential and small commercial construction applications, including residual contents and associated containers, up to a maximum size of 680 grams (24 ounces).

⁷ Products designed for use on humans (e.g., personal defence sprays, including mace or pepper spray) are excluded.

4.4.8 Canisters Designed to Be Punctured During Use

The Program accepts non-refillable puncture-use fuel canisters intended for consumer, household, recreational, or outdoor use, including residual contents and associated containers, up to a maximum size of 680 grams (24 ounces).

4.4.9 Non-Program Canister Products

Products that are leaking, damaged, unidentifiable, or otherwise unsafe to manage may be refused acceptance to protect collection site staff and service providers.

As per the Regulation, the canister product category does not include the following canisters or their contents:

“(a) canisters containing the products, substances or organisms included in the following classes listed in the Schedule to the Transportation of Dangerous Goods Act, 1992 (Canada):

- (i) Class 1 — Explosives;*
- (ii) Class 6 — Poisonous (toxic) and infectious substances;*
- (iii) Class 7 — Nuclear substances that are radioactive;*

(b) canisters designed for police or military use;

(c) canisters designed to be used exclusively in an institutional, industrial or laboratory setting.”

4.5 Automotive Products

Automotive products are newly designated product categories under this amended Program. This Program Plan includes product subcategories within the automotive products category for which Product Care has received producer mandate. This product category includes products primarily designed for use with a motor vehicle.

The Program includes the following automotive product subcategories as Program Products:

- Engine conditioners;
- Stabilizers;
- Sealants;
- Sealers;
- Engine conditioners;
- Boosters;
- Solvents;
- Degreasers;
- Fuel system cleaners;

All automotive products supplied in aerosol canisters are managed under the Aerosol Canisters category described in Section 4.4.1.

Non-aerosol automotive products included under the Program include residual contents and associated containers, up to a maximum container size of 25 litres.

Examples of automotive products include, but are not limited to:

- Fuel additives and stabilizers;
- Engine cleaners, degreasers, and flush products;
- Automotive lubricants;
- Radiator flushes and similar maintenance fluids;
- Automotive aerosol products, such as spray lubricants and degreasers.

4.5.1 Non-Program Automotive Products

As per the Regulation, *“the automotive product category does not include products designed for use in the cleaning or aesthetic maintenance of the interior surfaces, upholstery or exterior surfaces of a motor vehicle.”*

Clarification on Automotive Cleaning and Aesthetic Products

Automotive products designed primarily for cleaning or aesthetic maintenance of vehicle interiors or exterior surfaces are generally excluded from the automotive product category. However, where such products are supplied in pressurized aerosol form, they are regulated under the aerosol canisters product category and managed accordingly.

Products that are leaking, damaged, unidentifiable, or otherwise unsafe to manage may be refused acceptance to protect collection site staff and service providers.

4.6 Product Classification Hierarchy

To support consistent classification of products under the Program, Product Care applies a product classification hierarchy where each product is assigned to a single product category, even where product characteristics or regulatory definitions may overlap. Product classification will be refined as implementation progresses and operational data becomes available. In the interim, classification is determined using the following order of precedence:

1. Domestic pesticides
2. Paint products
3. Flammable liquids and gasoline
4. Canister products
5. Automotive products

Where a product meets the criteria of more than one category, the product will be classified according to the highest applicable category in the hierarchy above.

5 STAKEHOLDER CONSULTATIONS

Consultation information related to the expanded product categories will be incorporated into this section following completion of the consultation process. For consultation results associated with the approved Program Plan (March 13, 2026), please refer to the previously approved plan available on Product Care's [website](#).

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6 COLLECTION SYSTEM AND CONSUMER ACCESSIBILITY

6.1 Collection System

In accordance with section 5(1)(c)(iii) of the Regulation, the Program employs a comprehensive network of permanent year-round collection sites across BC providing consumers with reasonable access to locations where they can drop off Program Product for recycling and responsible management at end of life at no cost to the consumer. The permanent collection site system is comprised of two types of collection sites:

- Paint collection sites – collect leftover paint and paint aerosols only
- HSP collection sites – collect leftover paint, paint aerosols, and HSP products

HSP collection sites will build upon the Program's existing HHW collection infrastructure, which will serve as the primary collection network for newly added canister and automotive products. The existing collection system will be leveraged, as much as possible, to support integration of newly added products into the Program over time. Not all the existing HHW collection infrastructure will have the necessary capacity to take on some or all of the newly added products.

Unlike other EPR programs, establishment of collection sites for HSP products is subject to additional provincial and local regulatory requirements, such as the BC Hazardous Waste Regulations and zoning, which make it much more difficult to establish collection sites for paint and HSP.

Product Care assists collection sites in meeting regulatory requirements throughout the onboarding process and ongoing operations. This includes supporting collection sites in meeting regulatory requirements by managing key administrative tasks such as provincial registration, offering templates for emergency response and contingency planning, and coordinating third-party training to ensure compliance with federal regulations. Additionally, Product Care provides comprehensive collection guidelines that outline best practices for handling Program Products in accordance with provincial and federal standards related to dangerous goods, hazardous waste, and site safety. To further support compliance and safety, Product Care provides equipment designed for fire protection, worker safety, and spill containment.

Product Care does not directly own or manage any collection sites, but contracts with existing collection sites. Due to a variety of factors, not all sites are suitable for the collection of HSP products. 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
- Retailers
- First Nations

Product Care may coordinate with other producer responsibility organizations and existing collection systems, where appropriate, to support operational efficiency, maintain consumer access, minimize disruption to existing collection pathways, and facilitate the effective collection and management of products managed under this Program, subject to producer responsibility organizations and Product Care coming to terms on a business-to-business commercial agreement.

There is no charge to drop off Program Product at any collection site, provided the products are post-consumer program products generated within British Columbia.

Additionally, the Program provides an online [collection site finder](#) on Product Care's website to assist consumers in locating their closest collection site/service.

6.1.2 Collection Events (No Change)

Product Care augments its permanent collection system with a number of one day collection events, often initiated by and held in collaboration with a municipality, regional district or local community. Program Product is typically collected alongside other stewarded and non-stewarded products. The number of events held each year varies depending on the number of requests received from local government and any service gaps identified. The Program partners with the event organizers to supply collection containers and takes responsibility for the transportation and recycling of the collected Program Product.

6.1.3 Direct Pick-Up Service for Commercial and Large Volume Generators (No Change)

In addition to the permanent collection site collection system and collection events, the Program provides a no-charge direct pickup service for qualified commercial and large volume generators (LVG), subject to minimum quantities of post-consumer Program Product.

6.2 Consumer Accessibility (No Change)

In accordance with section 5(1)(c)(iii) of the Regulation, Product Care commits to provide reasonable access to collection services in the Province. In trying to develop an accessibility standard, the Stewardship Agencies of British Columbia (SABC)⁸ engaged the Recycling Council of British Columbia (RCBC) to conduct a review of local government service standards for solid waste and recycling services and other public services in the province to utilize as a reference. The review concluded that there is no applicable benchmark for accessibility.

SABC developed an accessibility standard that incorporates population data and drive-time metrics, aligning with regulatory requirements for reasonable access. For this plan renewal, Product Care has revised the SABC standard by reducing the drive-times, thereby enhancing accessibility compared to the previously approved program plan.

Product Care employs the following criteria to define "reasonable" access to program collection facilities. Reasonable access is defined as a 20-minute drive to a collection site in urban areas, and a 35-minute

⁸ The Stewardship Agencies of BC (SABC) is a coalition of Extended Producer Responsibility (EPR) organizations from across British Columbia working together to promote and manage responsible "end-of-life" programs for obligated products.

drive to a collection site in non-urban areas⁹ with a population greater than 4,000.¹⁰ Urban communities are defined as cities, district municipalities and towns within the Metro Vancouver and Capital Regional Districts with a population of 4,000 or more and cities and district municipalities with a population of 30,000 or more in the remainder of the province. Rural communities are defined as cities, towns, resort municipalities, and district municipalities with a population of between 4,000 and 29,999 outside the Metro Vancouver and Capital Regional Districts. The Program also provides permanent collection services in many communities with populations less than 4,000, as well as collection services to other rural, remote areas and First Nation communities of the province.

These criteria represent a minimum accessibility threshold for the Program. In practice, the Program's accessibility extends beyond these criteria, providing permanent collection services in many communities with populations less than 4,000, as well as collection services to other rural and remote areas of the province through collection events and large-volume direct pickup service.

Product Care remains committed to strengthening and expanding its collection network to improve service levels across BC, with a focus on identifying and addressing underserved areas. This includes working directly with local governments, through the Stewardship Agencies of British Columbia (SABC), and in collaboration with other EPR programs to expand access where gaps exist. The program will report annually on service gaps as identified per the enhanced SABC accessibility standard.

Product Care also partners with Indigenous communities through initiatives such as the Indigenous Zero Waste Technical Advisory Committee (IZWTAG) and the First Nations Recycling Initiative (FNRI) to extend collection services, particularly in First Nation communities. These partnerships are supported through training, transportation, and recycling services.

The integration of newly added product categories into the Program may present operational limitations within portions of the existing collection network. Certain collection sites may face constraints related to available space, storage capacity, infrastructure requirements, safety considerations, or contractor capabilities that could affect their ability to manage additional products. As implementation progresses and operational experience is gained, Product Care will continue to evaluate the impacts of newly added product categories on the collection system and overall Program accessibility, including opportunities to expand or adapt the network where appropriate.

6.3 Evaluating Collections (No Change)

Unlike some other stewarded products, such as tires, beverage containers and electronics, Program Products are consumable products that are consumed varying degrees of frequency, over an indefinite period of time. Consumers may use all or some portion of Program Product and keep Program Product in their possession for years after initial use, as many do not have an expiry date. Program Product is only considered waste at the point where the consumer no longer values it or has any use for it. Factors such

⁹ Accessibility criteria provide increased requirements for program performance over previous program plans.

¹⁰ The Stewardship Agencies of BC conducted consultations with local governments on the appropriate criteria to use to determine accessibility. There was no consensus on whether to apply a time-based or distanced-based measure.

as the consumable nature of the product, the variety of types of products within a certain product category, varied product life expectancy, absence of a defined expiry date, and consumer behaviour make collection volume a questionable metric for evaluating program performance.

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

An alternative approach is to measure Program Product collected using “container capacity volume” (CCV), also known as “equivalent litres of containers” (ELC). CCV is the measure of the maximum capacity of containers, if they were full, returned through the Program. CCV values are extrapolated from the number of tubskids¹¹ of Program Product managed by the Program.

Another collection metric is the recovery rate, which compares the recovered residual volume (RRV) of product recovered in a given year to the volume of product sold (in litres) in that same year:

$$\text{Residual Recovery Rate} = \text{Litres of paint recovered} / \text{Litres of paint sold}$$

While the recovery rate can be a helpful indicator of program performance, it must be recognized that it is a ratio of two values, which can be influenced by different factors in a given year, such as market conditions and consumer purchasing behaviour beyond the Program’s control. For example, even if the program achieves a higher RRV and consumer awareness in a given year, the recovery rate can decline in comparison to previous years if sales in the same year increase at a higher rate. On the other hand, a decrease in the recovery rate may be a reflection of consumers using paint more efficiently. Again, it is important to look at trends over time in conjunction with other performance indicators.

Predicting future collections and setting associated targets is challenging in the face of changing policy, product reformulations, erratic market conditions and consumer behaviour. For example, British Columbia introduced a recent ban on pesticides in July 2021, which is expected to result in a decline in the amount of designated product sold into the BC pesticide market. Pesticide product reformulations have also potentially reduced the scope of products captured under this designation, as reformulated products may no longer meet the definitions in the Recycling Regulation. The solvent and flammable liquid category of products encompasses a broad range of product types with a myriad of uses and applications making it difficult to evaluate as a product category. Segmenting the various types of solvents and flammable liquids at point of collection or processing to evaluate collection patterns is both impractical and cost prohibitive. Furthermore, trying to assess the trends of each in estimating overall collection targets is subject to high degrees of error. Global events, such as the COVID-19 pandemic and more regional events, such as large-scale fires and floods, which are expected to become more the norm in

¹¹ Tubskids are collection bins used to collect, transport containers of Program Product from collection sites to processing facilities.

future years, have had a direct impact on both sales and collections of all Program Product in unexpected ways (e.g., supply chain disruptions impacting sales and property destruction resulting in increased sales, disruptions to collection networks and increased collection volumes from restoration work.) It is also very difficult to determine with any certainty how much Program Product will be available in any given year because of changes in consumer usage patterns. Finally, as explained above, setting targets for certain performance measures (recovery rate) does not recognize the purpose of the metric and what it says about program performance. For these reasons, the Program will continue to report out on volumes collected and recovery rates for each product category but will not set collection or recovery rate targets. However, Product Care will continue to assess and explore potential performance metrics to determine whether any are appropriate for the Program.

6.4 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. Not all local governments conduct waste audits and for those that do, the audits are not always conducted on an annual basis. Given the scope, logistics and costs associated with conducting waste composition audits, it is necessary that audits are conducted in conjunction with local governments and other stewardship agencies. Product Care reviews the scheduled audits with other SABC members and collectively they agree to participate in those that have the appropriate scope (i.e., audits of residential waste at landfills).

Waste audits are coordinated by local governments and typically, are conducted by third party consultants engaged by local governments. The waste composition study methodology and sample sizes are determined by the local government responsible for the audit. The product categories to be included in the studies are determined in cooperation with the various stewardship agencies.

The report provided by the consultant conducting the study includes the date and location of the audits, as well as the number of units of Program Product identified. The audit results are considered to be informative for the region in which the study was conducted. However, due to regional variations in consumer behaviour, collection patterns and waste management practices, results from one audit are not considered applicable to other regional districts, nor should they be extrapolated to the regional or provincial level.

In addition, the Program undertook a study in 2019 to investigate possible alternative management streams for Program Product, including consumer reuse, scrap metal collection, curbside recycling, landfill, illegal dumping, and management approaches by commercial users. Findings from that study are summarized in the Program's 2020 annual report available at <https://www.productcare.org/about/annual-reports/>.

7 CONSUMER AWARENESS

In accordance with section 5(1)(c)(iv) of the Regulation, the purpose of the Program’s communications activities is to make consumers aware of:

- That Program Product can and should be recycled at designated collection facilities
- The location and availability of collection services
- How to manage products in a safe manner to ensure they are handled properly during use and are recycled at end-of-life

Product Care invests in understanding consumer behaviour around Program Products, which are often retained for long periods and require a different educational approach than fast-moving consumer goods. Awareness strategies are tailored to reflect infrequent purchasing and low top-of-mind recycling awareness. To complement survey data, the program leverages digital platforms, where over 90% of annual visitors are new users. Digital advertising is optimized to target likely consumers and measure high-intent engagement— such as users clicking the [“Find a Recycling Location”](#) button after viewing accepted products. These digital metrics offer a broader and more comprehensive view of awareness and user action, capturing the full scope of website interactions beyond the limitations of survey sampling.

The consumer awareness survey is conducted on a bi-annual basis as part of a coordinated effort led by SABC. SABC is responsible for overseeing the process and contracting an independent third-party research firm to administer the survey. This approach ensures that data collection and analysis are conducted objectively and consistently across all participating Extended Producer Responsibility (EPR) programs.

As requested by BCMoEP during review of the previously approved Program Plan, beginning in the next survey cycle (Autumn 2026), Product Care will measure consumer awareness separately for paint and HHW. As the Program transitions to the HSP framework, Product Care will instead measure consumer awareness separately for paint and the HSP product category.

Survey questions will be structured at the category level (paint and HSP), with HSP awareness reflecting the overall HSP product scope managed under the Program. As a result, a single “overall program” consumer awareness metric will no longer be used, as it would not be meaningful once awareness is measured independently for paint and HSP. Because this will be the first time consumer awareness for paint and HSP is measured separately, no historical baseline exists from which to establish increasing year-over-year (or biennial) targets. Product Care therefore proposes to use the 2026 survey results to establish baseline awareness levels for each category. Given that this baseline will be derived from a single survey cycle, the results will provide an initial reference point rather than a trend. Accordingly, program-level consumer awareness targets are not proposed for 2026.

Once targets are set, should awareness levels through the consumer survey fall below the set target, over multiple consecutive years, Product Care will implement a targeted consumer awareness plan. This includes the following corrective actions:

- Refining messaging to enhance clarity and relevance
- Increasing the frequency and reach of digital campaigns by allocating additional resources

Both measures would be implemented within 12 months of identifying a sustained, multi-year decline in awareness, below the set target. It's important to note that fluctuations in consumer awareness survey results are expected and do not necessarily indicate a trend. The targeted consumer awareness plan would only be triggered if the program observes a consistent and continuous decline over time, rather than isolated or short-term variations.

Product Care focuses on educating those responsible for purchasing and using Program Product about responsible management of residual, unwanted Program Product through the Program. Strategies target both residential and commercial (for paint only) consumers. Consumer research has also identified three key segments of residential paint consumers: homeowners, young urban residents and older rural residents. Targeted messaging is placed to engage these particular market segments.

Product Care invests significant resources to maintain a comprehensive public education strategy/program and to reach, if not exceed, the Program's consumer awareness target for residential users and to engage commercial users (for paint only). Messaging is highly targeted, highly relevant, and highly engaged.

The Program's strategy and tactics are informed by three core pillars:

- Identify the three Ps – people (who are using Program Product), place (how do we find these people) and promotion (how will we reach them)
- Go a mile deep, not an inch wide – instead of blanket awareness campaigns, focus on relevant consumers at times that matter.
- Identify 'key touchpoints' – at which points in the product's lifecycle are people most likely to engage with Program Product (when is our message relevant)

The 'key touchpoints' approach to consumer education focuses on four key moments throughout the product's lifecycle where consumers are engaged.

- **Point of Sale (POS):**
 - Product Care works directly with brand owners and retailers to ensure residential and commercial users (for paint only) are aware of their responsibilities. Product Care offers a suite of free tools for point-of-sale education, such as posters, brochures, educational literature for retailer websites, and social media content for use on retailers' channels.
- **Active lifecycle:**
 - Product Care engages consumers throughout the product lifecycle using a mix of proactive and responsive strategies, including media buying, search advertising, and partnerships. Education efforts run year-round, with increased activity during peak seasons. Given the longer lifespan of program products, content also focuses on proper storage and handling at end-of-life to improve the likelihood that products can be properly managed and recycled.

- A central website (productcare.org) provides accessible information on recycling requirements and best practices. Evergreen content is supported by topical articles and blog posts that address seasonal issues and improve online visibility of credible recycling information.
- Ongoing development of educational materials, including web content, blogs, and social media, will continue to support public awareness and engagement. These efforts are tracked and reported as part of the program's broader consumer education strategy. The Program is also committed to reporting annually on these awareness efforts as part of its ongoing consumer education strategy.
- **End of life:**
 - Consumer inquiries seeking information about the Program, such as accepted products and collection site locations, are serviced by Product Care staff or through other services, such as RCBC's hotline, website and Recyclepedia app. Product Care also operates a user-friendly website (productcare.org) that is regularly reviewed and improved upon, which hosts information about the Program, including accepted and not accepted products, a recycling location locator tool, and how to manage Program Product at end-of-life.
 - In addition to outlining proper storage and handling practices while the product is in use, the program also provides consumers with guidance- via the program's webpage and printed materials- on how to return the product at the end of its life.
- **Point of Return (POR):**

Product Care employs a robust point of return education program, with free materials offered to collection partners, such as indoor and outdoor signage, educational brochures containing program information, and training for collection site staff to guide consumers at POR.

Third-party organizations serve as valuable channels for delivering product Care's consumer facing messaging about the proper disposal methods of program products. These partnerships offer opportunities to align with organizations that share similar goals, audiences, or activities. By working together, both parties can leverage each other's networks to broaden reach and amplify key messaging.

Product Care actively seeks partnerships with a wide range of stakeholders, including municipalities, brand owners and retailers, industry associations, environmental organizations, First Nation groups, stewardship agencies, and community groups or events.

Examples of these partnerships include:

- Collaborating with other stewardship programs to develop joint information materials and providing consumers with centralized access to information through portals such as the Recycling Council of BC hotline, Recyclepedia website, and mobile app.
- Hosting collection events in collaboration with municipalities and other stewardship programs, where opportunities and synergies exist, to enhance program effectiveness and community engagement.

- Partnering with First Nation organizations such as the Indigenous Zero Waste Technical Advisory Group (IZWTAG) to support outreach and engagement in First Nation communities across British Columbia.
- Participation in community events, such as open houses at landfills or collection sites, local festivals, and municipal gatherings, offers opportunities to connect directly with residents.

Product Care remains committed to strengthening its network of third-party partners to help validate and amplify messaging about the importance of safely disposing of paint and HSP products.

Consumer awareness activities related to newly added product categories introduced through the BC product expansion, including canister and automotive products, will be incorporated into the Program's existing consumer education activities.

8 MANAGEMENT OF PROGRAM COSTS (NO CHANGE)

8.1 Program Revenue and Environmental Handling Fees

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

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

The EHF's are set by Product Care and are subject to change as needed to address surpluses or deficits and to ensure the financial sustainability of the Program. Given that the Program does not have direct control over its revenue stream, EHF's are reviewed on an annual basis to ensure the Program remains financially sustainable. As part of this review, Product Care will assess the EHF rates against a five-year forecast of the Program and make any necessary adjustments to ensure the Program meets its financial sustainability targets. These adjustments are approved by the Product Care Board of Directors and also provided to members for commentary before they take effect, no later than April 1 of the following year. Given that the supply chain in the HHW sector is very complex, and any changes to EHF's have a significant impact on the various industry sectors within the supply chain, Product Care tries to minimize the frequency of EHF's changes. Current EHF's for Program Product are listed on the Product Care website, www.productcare.org.

The Program applies differential fees based on container sizes for all product categories. In setting EHF's, Product Care considers a range of factors, including typical container sizes, the cost of recycling, and the relative market share of products. These inputs allow fees to reflect the most significant drivers of end-

of-life management costs without creating undue complexity. While Product Care has considered the application of differential fees based on the environmental characteristics of Program Product and associated packaging (e.g., oil- versus water-based paints, metal versus plastic containers). The difference in the true costs of managing different types of products is limited to the differences in processing costs for these materials. When considered in the context of the full costs of managing paint and the market share of each paint sub-category, the differential is nominal. Moreover, implementing differential fees based on product and/or packaging variations would result in an overwhelming number of fee categories and be very difficult to implement throughout the supply chain creating consumer confusion at point of sale.

8.2 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.

8.3 Audited Financial Statements

In accordance with Section 8(2)(f)(ii) of the Regulation, Product Care's audited financial statements, as well as the Program's revenues and expenses, will be posted on the Product Care website as appendices to the Program's annual report.

8.4 Producer Compliance

In order to maintain a 'level playing field' for Program members and to ensure compliance with the Regulation, the Program actively searches for, identifies and recruits Producers of Program Product. If an obligated Producer does not join the Program, despite being notified of their regulatory obligation, the Program refers the obligated party to the BCMoEP to pursue compliance and potential enforcement proceedings.

8.5 Paying the Cost of Collecting and Managing Products

In accordance with section 5(1)(c)(i) of the Regulation, the Program Plan must "*adequately provide for [...] the producer collecting and paying the costs of collecting and managing products within the product category covered by the plan [...].*" Product Care commits to being responsible for the establishment, operation, and funding of systems for the collection and management of products within each product category covered by this EPR Plan, regardless of whether an Environmental Handling Fee has been applied, provided the products are post-consumer program products generated within British Columbia.

All collection sites operate under an agreement between the collection site operator and the Program. The Program provides all contracted collection sites with collection containers and other collection supplies at the Program's expense.

In response to the BCMoEP guidance document “Producers paying the cost of managing obligated materials and dispute resolution”, Product Care retained the services of BDO Canada LLP, one of the largest full-service advisory and accounting firms in the world, to conduct a cost study and develop a cost model to determine the adequacy of collection site compensation for the Program as well as the other extended producer responsibility programs operated by Product Care. BDO Canada LLP, conducted market research, including information from representative collection sites and identification of various costs related to the collection of products for all Product Care programs in British Columbia, to determine if the compensation paid to collection sites adequately covers their costs of collecting and handling Program Product. The approach included:

- Identification and assessment of various collection site cost inputs for the collection and handling of products, incorporating direct costs and indirect costs, and relevant studies;
- On-site visits to collection sites and interviews with a selection of collection sites to obtain various available and relevant information, financial and non-financial;
- Development of a collection site costing model based on the data collected and market research supplemented best practices, knowledge, perspective and experience gained by BDO Canada LLP from similar past studies;
- Adjusting handling times and space requirements based on feedback from consultations; and
- Application of a 5-year stress test for inflation.

In accordance with the BCMoEP guidance document, Product Care held public consultations on the cost model and dispute resolution provisions. The report was distributed along with the consultation notice and made available on Product Care’s website. Product Care held two webinar sessions to solicit feedback on the report’s findings. In accordance with the BCMoEP guidance document, Product Care submitted a report to BCMoEP on December 23, 2019, including a link to the full BDO Canada LLP report and a summary of stakeholder feedback along with Product Care’s responses. The model will continue to be used to confirm that Product Care continues to pay the cost of collecting material, taking into consideration cost input data received from collection sites.

With regard to the Program, the BDO report concluded that: “... *the Product Care compensation for Paint & HHW... handling at the Tier 1 - 3 collection sites is adequate relative to their costs.*” BDO also found positive margins after adjusting for inflation over five years. The study found that collection sites that collect very low volumes (i.e., Tier 4 sites) are not able to cover their costs under the program’s compensation model that compensates collection sites based on the amount of Program Product collected, despite operating costs associated with the program being negligible. Accordingly, the Program adjusted the compensation for Tier 4 sites that did not show positive margins based on the study’s results.

The cost model developed by BDO provides a baseline for understanding collection costs, incorporating factors such as site-level data and inflationary impacts. Product Care uses this model as a reference point, supplemented by information gathered through its business-to-business relationships with collection sites and service providers, to confirm that fees continue to cover program collection costs.

Product Care interacts with various stakeholders, including but not limited to collection sites, on an ongoing basis, which allows stakeholders to provide feedback on the Program's operations, including but not limited to:

- Visiting collection sites
- Engagement at conferences
- Ongoing engagement/consultation with program members as detailed above.

The program intends to review and reassess cost structures once per plan cycle.

9 MANAGEMENT OF ENVIRONMENTAL IMPACTS

The objective of the Program is to minimize the improper disposal of Program Product by providing an effective collection program and ensuring that the collected materials are either reused or recycled or disposed of in an environmentally responsible manner. The Program encourages consumers to buy the right amount, use up the products they buy and to dispose of their unwanted Program Product through the Program, rather than disposing of them improperly in the garbage or directly into the environment (the "B.U.D. Rule"). The Program manages collected Program Product using the highest viable option on the pollution prevention hierarchy as set out under section 5(1)(c)(v) of the Regulation. The application of the pollution prevention hierarchy and the management of each product varies depending on a number of considerations, such as product composition, availability of appropriate recycling technologies, qualified service providers, sufficient economies of scale, the existence of end markets for commodities and global market conditions. This section details the management options and considerations for Program Product.

9.1 Reduce and Redesign

The paint industry is a consolidating industry, and most brand owners manufacture for a market area that includes more than one province or country. Nevertheless, 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:

- The steady shift in the marketplace from oil-based (alkyd) paints to water-based (latex) paints.
- Reduction of volatile organic compounds and reintroduction of bio-based ingredients in the composition of surface coatings.
- Refinements to manufacturing processes that reduce resource consumption, minimize waste and enhance efficiency.

In addition, tools used by Product Care that may have an impact on product life cycle and reduction of environmental impact for all product categories include:

- Applying variable EHF's based on container size (see discussion of differential fees under [section 8](#) above.)

- Promoting the “B.U.D.” rule (i.e., “Buy” what you need, “Use” what you buy and “Dispose” of the remainder responsibly)
- Educating consumers on the proper storage of leftover paint (see [section 7](#))
- Researching alternative management options for collected materials; this includes, but is not limited to:
 - Collaborating with industry partners to explore new technologies that improve the management of complex product streams;
 - Engaging new and existing service providers to improve the management of waste generated from Program Product processing; and
 - Modifying current processing methods to enhance the recyclability of Program Products.

9.2 Reuse and Recycle

Leftover paint accounts for the largest volume of Program Products managed. Additionally, leftover paint can be managed in a number of different ways while there are limited options for the management of other HSP products. The processing of paint and HSP 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

The Program offers a reuse service where high-quality, non-aerosol paint brought to collection points that meets specified criteria is given away at no charge to consumers to be used for its originally intended purpose. The reuse of paint is high on the pollution prevention hierarchy and provides economic efficiencies for the Program. The Program does not offer paint aerosols for reuse due to concerns over possible misuse (e.g., graffiti).

While the program strives to educate consumers on proper paint handling and storage to maintain quality for future use or recycling, it cannot control the quantity of paint returned that meets reuse requirements. The program promotes best practices to ensure leftover paint remains suitable for reuse and recycling, but the availability of such paint ultimately depends on the users (i.e. storage, harsh weather etc.). Examples of users of the reuse service include individuals, community organizations, theatres and anti-graffiti programs.

The reuse service is not suitable for all collection sites due to space and staffing requirements.

Reuse is not an option for HSP products due to:

- Regulatory requirements that impose criteria/limitations on the use of ingredients and allowable concentrations;
- Safety concerns with handling specific products;
- Regional bans on certain pesticide use that prevents such leftover pesticides from being used;

- Contamination of the product through use (i.e., oil contaminated gasoline).

Recycling

The ability to recycle paint depends on several factors, including the age, quality, and physical state of the returned paint, which determines its suitability for recycling. The recyclability of paint is also influenced by the fact paint is already tinted and the ability to alter the colour of recycled paint is limited.

Paint-to-paint recycling is also heavily dependent on whether there is a demand or market for the recycled paint. Selling recyclable paint requires more shelf space at retail versus just carrying virgin base paint and adding tint at the counter. Furthermore, regulatory requirements, such as the Volatile Organic Compound (VOC) Concentration Limits for Architectural Coating Regulation that limit the concentration of VOCs, also limits the amount of paint-to-paint recycling.

Recycling oil-based paint back into paint is more difficult due to several factors:

- Hazardous waste and transportation regulations, which limit the movement of this kind of material.
- Old oil-based paints tend to be higher in VOCs, preventing the recycled products from meeting current regulatory requirements.
- Water-based paint technology has improved significantly, such that new formulations equal or outperform the performance of oil-based paint. Consequently, the market for oil-based products is significantly smaller than that for water-based paint products and is diminishing making it more difficult to find end markets for the recycled product.

In addition to paint-to-paint recycling, water-based 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 water-based paint that can be utilized in this manner. Utilizing oil-based paints in concrete manufacturing is not an option due to its chemical properties.

While Product Care strives to recycle as much of the water-based paint collected as possible, management options are dictated by the quality of paint received from consumers, which is beyond the Program's control. Paint of certain colour or chemical composition, poor quality or paint that is solidified cannot be recycled. In such instances, the product is used for energy recovery (see below). In addition, unlike virgin paint, there is limited ability to adjust the colour of recycled paints, which limits the choice of consumers; a factor which limits demand for recycled water-based paint, and which is beyond the Program's control.

Unlike paint, HSP Products encompass a very broad range of product categories, industry sectors, product types and different uses/applications, ingredients, concentrations, physical state, etc. For these reasons HSP products are typically not recycled.

With regulatory bans on certain ingredient in pesticides combined with regional bans on the use of certain pesticides, reuse is not an option. Pesticides are heavily regulated and due to the hazardous nature of pesticides, regulations limit the management option to dedicated incineration.

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 solidified water-based paint) typically have varying degrees of heat value, which makes them more or less suitable for energy recovery, especially oil-based 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.

For certain HSP products, 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 HSP products, such as pesticides and aerosol residuals. Pesticides need to be treated at temperatures high enough to avoid creating hazardous by-products. In addition, pesticides and polychlorinated biphenyls (PCB) contaminated paints require dedicated incineration at licensed and permitted facilities.

Incineration

More hazardous HSP products, such as pesticides, are not suited for energy recovery, and instead, must be incinerated at high temperature in a government regulated and permitted incinerator.

Disposal

The program currently does not landfill any material. Landfilling is only considered as a last resort and only after all other management options, such as recycling, energy recovery, incineration, or material storage, have been fully explored and deemed unviable.

The recyclability of paint is increasingly affected by a shortened shelf life once containers are opened. In addition, reformulations influenced by federal regulations, have reduced the amount of preservatives required for product stability. Climate-related temperature fluctuations, further contribute to paint degradation.

Due to limited capacity for processing unrecyclable water-based paint, not all material can be directed to energy recovery. In such cases, a portion may need to be solidified and landfilled. Oil-based paint and HSP are typically prohibited from landfills. Accordingly, landfilling is not considered as an option for these types of products. See Table 3 in [Section 11](#) for more information.

9.3 Management of Newly Added Product Categories

Based on research of available management options, Product Care has identified preliminary end-of-life management pathways for newly added product categories, including canister and automotive products. These proposed pathways reflect current industry practices, processing capabilities, and product characteristics.

For canister products, management approaches may include energy recovery and incineration for hazardous residuals; recovery and disposal for non-hazardous residuals; and metal recycling for containers, depending on the specific product type and its contents.

For automotive products, management may include energy recovery and incineration for hazardous residuals; recovery and disposal for non-hazardous residuals.

These management pathways are preliminary and subject to change. Final end-of-life management approaches will be confirmed and refined following program implementation, based on operational experience, available processing capacity, regulatory considerations, and confirmation of appropriate end markets.

9.4 Management of Containers (No Change)

In addition to managing residual materials returned by consumers, the program also manages the containers when they are returned with residual product. While the primary focus remains on minimizing the environmental impact of the residual, given its immediate risk when improperly managed, container management presents its own set of challenges.

Program Products are typically packaged in metal or various types of plastic. Although recycling markets exist for clean, high-volume streams of these materials, the unique nature of Program Product containers makes them difficult to recycle once emptied. Key challenges include:

- Reduced appeal to recyclers due to hazardous residues requiring regulated handling (e.g., pesticides);
- Difficulty in fully cleaning containers, which can lead to additional waste generation;
- Persistent odours embedded in container materials;
- Mixed-material packaging that requires specialized equipment or manual separation;
- Low-grade classification of containers, making them less desirable to recyclers;
- Protective coatings on metal cans that complicate recycling processes;
- Inconsistent volume, type, and colour of plastic containers, limiting economies of scale;
- Market volatility and fluctuating commodity prices; and
- A limited number of recyclers are equipped to process these types of containers.

These challenges can sometimes limit the ability to recycle Program Products containers, making alternative management approaches, such as energy recovery or, if necessary, landfilling.

10 DISPUTE RESOLUTION (NO CHANGE)

The Program contracts with all suppliers and service providers by way of commercial agreements. Any disputes are resolved through normal commercial dispute resolution practices, including:

- Discussion between the service provider and Product Care manager
- If necessary, escalation of discussion to Product Care senior staff
- If necessary, escalation of discussion to Product Care board
- If necessary, undertaking legal proceedings, including the option of mediation or binding arbitration, with the consent of the parties

The first two procedures can be conducted with the consent of both parties, via conference call and/or video conferencing, including actual recordings of the meetings to be made available to both parties.

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11 PERFORMANCE MEASUREMENT SUMMARY AND REPORTING COMMITMENTS

Given the complexities and nuances in managing the range of products covered in the Program, program performance should be assessed based on a suite of performance measures and not any one specific measure. Accordingly, this Program Plan sets out a number of performance metrics, which collectively, illustrate the Program's success. First, accessibility targets ensure that British Columbians have reasonable and free access to the Program's contracted collection sites. Second, consumer awareness tactics provide consumers with easily accessible information on where and how to recycle their Program Product when they reach end-of-life, and consumer awareness targets evidence the success of these tactics in building consumer awareness of the ability to recycle Program Product. Together, these metrics provide a strong indicator of program performance.

The Program also reports out on collection volumes, however as noted previously, collection volumes are a questionable metric to assess program performance for consumable products.

Table 1 summarizes the targets and commitments of this Program Plan and indicates which non-financial elements of program performance are subject to audit by an independent third-party auditor in accordance with Guidance on Third Party Assurance for Non-Financial Information provided by the BCMoEP.

Unless otherwise indicated, all performance requirements, commitments and targets apply until the five-year anniversary of the Program in accordance with section 6 of the Regulation (i.e., July 16, 2027). Following that period, the Program will continue to report against all commitments and targets until they have been reassessed.

Table 1: Performance Measures and Program Commitments

Performance Metric	Reporting Commitment/Target	Subject to Audit
3. Appointment of Stewardship Agency		
Stakeholder advisory committee	Establish a provincial advisory committee by the end of the first full reporting year following plan approval to provide ongoing engagement with key BC stakeholders.	N
Product Care’s structure and governance	Per the request of the BCMoEP, any changes to Product Care’s structure, governance, or board members (including their affiliations) will be disclosed either in Product Care’s annual report <i>or</i> through an updated posting on the Board of Directors page of our website .	N
6.1 Collection System		
Collection sites	Report annually on the number and location (city and regional district) of contracted Paint collection sites and HSP collection sites.	Y
	Report annually on contracted collection sites opened and closed during the reporting year, including name and location.	Y
Collection events	Participate in <u>collection events</u> in partnership with and organized by <u>local governments</u> where there is <u>no collection service</u> provided by the Program in that year and it is not a collection event for products associated with Product Care programs only.	N
	Report annually on the number and location (city and regional district) of paint and HSP collection events.	N
6.2 Consumer Accessibility		
Accessibility	Provide permanent collection service to a minimum of 95% of the population that meets the standard set out in section 6.2 of the program plan for both paint and HSP products.	N
	Report annually on service gaps as identified per the SABC accessibility standard.	N
	Report annually on the number of communities beyond the Program’s accessibility criteria that received collection services (i.e., permanent collection site or collection event).	N
	Consult with regional districts on an annual basis to identify communities that require access to evaluate the available options.	N
	Provide initial response within 3 business days to inquiries from rural/remote/First nation communities for collection of Program Product where there is no reasonable access.	N

Performance Metric	Reporting Commitment/Target	Subject to Audit
	Work with Indigenous Zero Waste Technical Advisory Group (IZWTAG) to support collections services in First Nation communities that are ready to engage.	N
	Beginning in the calendar year following plan approval, Product Care will report annually on the First Nation communities that received collection services for Paint & HSP, and report on the types of collection service(s) (events or permanent collection sites) provided to each community.	N
Accessibility	Provide direct pickup service for qualified large volumes.	N
6.3 Collections		
Volumes sold	Report annually on total estimated volumes of paint, pesticides and flammable liquids/gasoline sold in litres. Reporting approaches for newly added product categories will be determined as implementation progresses and operational data becomes available.	Y
Container capacity volume	Report annually on total container capacity volume of paint, pesticides, and flammable liquids/gasoline collected for the province and by regional district. Reporting approaches for newly added product categories will be determined as implementation progresses and operational data becomes available.	Y
Residual recovery volume	Report annually on total estimated recovered residual volume of paint, pesticides and flammable liquids/gasoline in litres for the province and by regional district. Reporting approaches for newly added product categories will be determined as implementation progresses and operational data becomes available.	Y
Recovery rate	Report annually on the recovery rate for paint, pesticides and flammable liquids/gasoline.	Y
Ratio of CCV to paint sold	Report annually on the ratio of volume collected (CCV) compared with the total amount of paint sold, in litres.	Y
Per Capita Collection	Report annually the per capita collection in each regional district.	N
6.4 Waste Composition Audits		
	Participate in all waste composition audits committed to by SABC.	N

Performance Metric	Reporting Commitment/Target	Subject to Audit
Waste composition audits	Report annually on the number and location of waste composition audits conducted.	N
	Report annually on kilograms per capita of Program Products identified in each waste composition audit.	N
7. Consumer Awareness		
Consumer Awareness - Product Categories	Establish baseline consumer awareness levels for the paint and HSP product categories using the 2026 survey results, which will inform the development of future category-specific awareness targets.	N
Consumer awareness	Report annually on educational strategies and materials undertaken by the Program.	N
Consumer awareness survey	Conduct a residential consumer awareness survey of consumers every two (2) years and report the survey questions used, a summary of the survey methodology employed, and awareness level achieved.	N
Targeted consumer awareness plan	Implement a targeted consumer awareness plan if survey awareness levels significantly fall below the set target over a sustained, multi-year decline.	N
Consumer awareness storage & handling	Product Care will report annually on consumer education efforts regarding the storage and handling of Program Products at end-of-life.	N
Commercial sector engagement	Undertake ongoing engagement with the commercial paint and HSP sectors through sector-based strategies, working with industry associations and report out annually on efforts undertaken.	N
Program website visits	Report annually on user visits to the Program's website.	N
RCBC Recyclepedia website visits and hotline calls	Report annually on user visits to RCBC's Recyclepedia website and the number of hotline calls received on Program Product.	N
PaintShare outreach	The plan will report annually on outreach efforts to promote awareness and participation in the PaintShare program (i.e. digital outreach, print materials, etc.).	N
8. Management of Program Costs		
Financial statements	Report annually the complete audited financial statements of Product Care Association of Canada, and the annual statement of revenues and expense for the Program.	Y
9. Management of Environmental Impacts		

Performance Metric	Reporting Commitment/Target	Subject to Audit
Design for environment	Report annually on significant developments, provided by the program's membership, that reduce the environmental impact and improve the recyclability of Program Product, as applicable.	N
Paint reuse	Report annually on the number of collection sites contracted to offer paint reuse.	N
	Report annually on the percentage of collected paint that is distributed through the reuse initiative.	N
Paint recycled	Report annually on percentage of collected paint that is recycled.	N
End fate management	Beginning in the calendar year following plan approval, Product care will report annually on final disposition for all product categories according to the Pollution Prevention Hierarchy. Each level of the Pollution Prevention Hierarchy, regardless of whether or not materials are managed at each level, will be reported on annually.	N
	Report annually on the approximate percentage of Program Product and associated containers managed in accordance with the different management options in the pollution prevention hierarchy.	N
	Meet or exceed end fate management targets for paint, flammable liquids/gasoline and domestic pesticides set out in Table 2 below.	Y

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Table 2: Performance Metrics for Specific Product Categories

Management of Environmental Impacts – Performance Metrics										
Method	Paint		Flammable Liquids		Pesticides		Gasoline		Canister Products	Automotive Products
	Residuals	Containers	Residuals	Containers	Residuals	Containers	Residuals	Containers	Residuals + Containers	Residuals + Containers
Recycling	Minimum 75% of water-based paint	100% of metal & HDPE (#2) *	--	100%*	--	100% of metal & plastic*	--	100%*	Material management will be determined as implementation progresses and operational data becomes available.	Material management will be determined as implementation progresses and operational data becomes available.
Energy Recovery	100% of oil-based paint	100% of polypropylene (#5)	100%	--	--	--	100%	--		
Incineration	--	--	--	--	100%	--	--	--		

* Market conditions are subject to change and may influence how materials are managed. The most current information on material management will be provided in annual reports.

APPENDIX A: SUMMARY OF STAKEHOLDER CONSULTATION PROCESS

To be included with the final Program Plan submission following completion of the consultation process.

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APPENDIX B: LIST OF CONSULTATION PARTICIPANTS

To be included with the final Program Plan submission following completion of the consultation process.

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APPENDIX C: SUMMARY OF STAKEHOLDER FEEDBACK AND RESPONSES

To be included with the final Program Plan submission following completion of the consultation process.

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