



NEW BRUNSWICK PAINT STEWARDSHIP PLAN



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1. INTRODUCTION

The Government of New Brunswick amended the [Designated Materials Regulation](#) 2024-37 (the “Regulation”) under the *Clean Environment Act* (O.C. 2024-166), effective July 15, 2024. The amendments require producers of designated materials, including paint, to operate under an approved stewardship plan to sell, distribute, or supply their products in the province.

Paint was previously regulated under *Designated Materials Regulation* 2008-54, under which Product Care Association of Canada (“Product Care”) has operated the New Brunswick Paint Stewardship Program (“the Program”) since April 1, 2009. As of 2024, the Program had 63 permanent collection sites across the province and has collected over 4.5 million litres of leftover paint since its inception.

Per the amended Regulation, Product Care’s members, who are brand owners, will remain bound by Regulation 2008-54, in accordance with Section 76(1), until December 31, 2025. The approved Program (2021-2025) under Regulation 2008-54 will expire on December 31, 2025.

In accordance with Section 76(4) of the Regulation, Product Care is required to submit a new Paint Stewardship Plan (the “Plan”) to the stewardship board no later than June 30, 2025. In accordance with Section 76(5) of the Regulation, the Plan will be implemented from the date of its approval or imposition by the stewardship board under section 40. In accordance with Section 40(4), the stewardship board shall set the expiry date of the Plan, which shall not exceed five years from the date it comes into force.

The following sections of the Regulation outline information on roles and responsibilities for Recycle New Brunswick (“Recycle NB”) and designation of producer responsibility organizations (“PROs”):

“Powers of the stewardship board:

7(2)(d) establish and administer, with respect to the manufacture, importation, distribution, sale, supply, offering for sale or supply, packaging, labelling, use, storage, collection, transportation, recycling, processing, disposal or other handling of a designated material,

(i) a management program, or

(ii) an oversight program”

Recycle NB is responsible for establishing and administering oversight or management programs for designated materials, including paint.

“Designation of a producer responsibility organization

37 For the purpose of performing on their behalf the obligations imposed under this Regulation in relation to the management of a designated material,

(a) a producer may designate a producer responsibility organization, and

(b) more than one producer may designate the same producer responsibility organization.”

Producers may designate a PRO to carry out the obligations under the Regulation on their behalf, and multiple producers may designate the same PRO to operate a common paint stewardship plan.

“Submission of a stewardship plan:

38(1) A producer shall, with its application for registration, submit a stewardship plan for the approval of the stewardship board.”

All obligated producers must register with Recycle NB and submit a stewardship plan for approval. The plan must outline how the producer or their designated PRO will manage the designated materials in compliance with the Regulation.

This Plan was developed in accordance with the Regulation and is submitted on behalf of the producers listed in [Appendix A](#), who have registered with Recycle NB and have designated Product Care as their PRO, pursuant to Section 37 (a), to implement and operate the Plan.

2. ABOUT PRODUCT CARE ASSOCIATION OF CANADA

Product Care was formed in 1994 in response to North America's first paint stewardship regulation in British Columbia. Product Care is federally incorporated under the Canada Not-for-profit Corporations Act, as a not-for-profit product stewardship association. It was established as an agency to allow its members to meet their obligations under applicable extended producer responsibility legislation. Product Care is governed by a multi-sector industry Board of Directors.

With over 30 years of leadership in extended producer responsibility programs, Product Care operates paint stewardship programs in seven other Canadian provinces -- BC, SK, MB, ON, NS, PEI and NL as well as stewardship programs for other products, such as household hazardous waste, smoke alarms, and lighting products in a number of provinces.

3. PLAN MEMBERSHIP

This Plan is submitted by Product Care on behalf of obligated paint producers (“producers”) who have designated Product Care as their PRO in accordance with section 37 (a) of the Regulation. Product Care’s membership includes producers (brand holders, importers, retailers, marketplace facilitators, or franchisors) of “paint” as defined according to the Regulation. Membership in the Plan is open to any obligated producers, subject to the terms of Product Care’s membership agreement.

[Appendix A](#) lists all producers that have registered with Recycle NB and designated Product Care as their PRO to operate the Plan on their behalf. Any new producers entering the marketplace after the Plan submission date will be directed to register with Recycle NB and invited to designate Product Care as their PRO, become a Product Care member, and be included under this Plan.

Product Care will inform Recycle NB of any non-compliant producers and of any potential free-riders for compliance activities in the province.

4. FUNDING

The Plan will be funded by membership fees, known as “environmental handling fees” (EHFs), remitted to Product Care by its members based on the quantity of sales of designated Paint Products (as defined in section 5 below) sold in or into New Brunswick. The EHFs are not a tax or a refundable deposit.

Section 50(2) of the Regulation notes the following:

"A producer or retailer who recovers costs shall integrate those costs

(a) in the total advertised sales price of a designated material or a product containing or including a designated material, and

(b) in the total sales price appearing on the receipt of sale of a designated material or a product containing or including a designated material."

Therefore, the EHF rates may not be shown as a separate fee and must be included in the total product price. Section 50(3) of the Regulation does permit a producer or retailer to inform the public that the total sales price includes the cost recovered (EHF rates).

"50(3) A producer or retailer is not prohibited from informing the public that the total sales price of a designated material includes costs recovered under subsection (1) and communicating the amount of those costs to the public."

Revenues generated by the EHF are used for the management of the Plan, including but not limited to:

- Administration,
- Public education and communication,
- Collection, transportation, recycling, recovery, and responsible disposal of collected products,
- Any fees assessed by Recycle NB's stewardship board for administration, as required by section 47(1) of the Regulation,
- Establishing and maintaining a reserve fund.

The reserve fund will be overseen by Product Care's Board of Directors. In accordance with Recycle NB's policy, Product Care will conduct an annual review of the reserve fund for the year ended December 31st, to be completed by June 30th of the following year, to ensure that the reserve fund does not exceed expenses for the following fiscal year.

While this is the objective, maintaining alignment of the reserve fund with annual expenses can be challenging, particularly when unexpected market fluctuations occur. Given the complexity of the paint sector, EHF changes can have wide-ranging impacts. Product Care, therefore aims to maintain stable fees to ensure predictability and minimize disruptions. Updated EHF rates will be posted on Product Care's website.

5. PRODUCT DEFINITION

Regulatory Requirement

39(b) a description of categories of material to be used for the purposes of annual reports and performance measures and targets

The Plan is responsible for managing post-consumer residual “paint” sold into the province, as defined in Section 51 of the Regulation:

“Definition of “paint”

51 For the purposes of this Division, “paint” means

- a) a tinted or untinted latex, oil or solvent-based architectural coating used for commercial or household purposes, including stain, and includes the coating’s container, or*
- b) a coloured or clear paint or stain sold in an aerosol container and includes the paint’s or stain’s container, but does not include coatings intended for industrial or automotive applications or marine antifouling.”*

For the purposes of annual reports, applicable performance measures, and targets, all products managed under the Plan are classified under two Categories of Material: Paint Materials Category and Container Materials Category. In all cases unless otherwise specified, reporting on applicable performance measures and targets will be combined, as described in Table 1 below.

This reflects how paint products sales are reported by producers, as sales reporting does not differentiate between container types or paint formulations (e.g., oil-based, or water-based paint), which is why, unless otherwise specified, the Plan reports Categories of Material on a combined basis. To require producers and the supply chain to modify their systems to have additional reporting, would be extremely administratively burdensome, add significant costs, and in many cases not possible, as they may not have the systems to accommodate or even have the necessary information.

Table 1: Reporting by Categories of Material

Regulatory Reference	Reporting Requirement	Categories of Material Applied
39(c)	Information on the province-wide collection system to be used by the consumer, including return facilities, by category of material	Undifferentiated across the Paint Materials Category and Container Materials Category – see Section 6.1.1
39(h)	Management plan for designated material waste, by category of material, according to the waste management hierarchy	See Section 6.2 for Categories of Material application
39(l)	Environmental and human health and safety standards, by category of material	Undifferentiated across the Paint Materials Category and Container Materials Category – see Section 6.3
39(m)	Plan for the elimination or reduction of environmental impacts of designated material waste, by category of material	See Section 7.1 for Categories of Material application
45(1)(a), (c), (d), (f) and 45(2)	Annual report information “by category of material,” including quantities sold, collected, processed, reused, recycled, and disposed	See Section 11.2, Table 6 for Categories of Material application
44 and 76(4)	Performance measures and targets for material management “by category of material”	See Section 10 for Categories of Material application

The Plan accepts products that fall within the definition of “paint” as per the Regulation and are included in the list of accepted products in Section 5.1. These products may be returned by any user in New Brunswick, including but not limited to households, businesses, institutions, all levels of government, and commercial painters, regardless of the producer.

5.1. Accepted Products

The following products are accepted under the Plan, provided they meet the definition of “paint” and are within the specified size limits.

- Architectural paint and related containers (including already empty containers) to a maximum container size of 25L, sold in, and into, New Brunswick including, but not limited to:
 - Interior & exterior: latex, acrylic, water-based, oil-based, enamel, oil-based deck coatings and floor paints (including elastomeric)
 - Varnishes and urethanes (single component)
 - Concrete/masonry paints
 - Drywall paints
 - Primers (metal, wood)
 - Undercoats
 - Stucco paint
 - Marine paint (unless registered under Pest Control Product Act)
 - Wood finishing oils
 - Wood preservatives (unless registered under Pest Control Product Act)
 - Melamine, metal & anti-rust paints, stains, shellac
 - Swimming pool (single component)
 - Stain blocking paint
 - Textured paints
 - Block fillers
 - Wood, masonry, driveway sealers or water repellants (non tar-based or bitumen based)
- Paint aerosols of all types to a maximum container size of 680g or 24oz (including already empty containers), such as:
 - Automotive aerosols
 - Craft aerosols
 - Industrial aerosols

5.2. Non-accepted products

The Plan is not responsible for managing products that fall outside the definition of “paint” under the Regulation or are not included under the list of accepted products in Section 5.1. Examples include but are not limited to:

- 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)
- Non-Aerosol craft paint
- Non-Aerosol automotive paint
- Two-part or component paints containing a catalyst or activator
- Roofing products (i.e., patch, tar or repair)
- Tar or tar/bitumen-based products
- Traffic or line marking paint
- Resins, fibreglass
- Paint thinner, mineral spirits or solvents
- Deck cleaners
- Colourants and tints
- Caulking compound, epoxies, glues or adhesives

- Nitro-cellulose based paints
- Brushes, rags and rollers
- Unknown, unlabeled, or non-original containers
- Leaking containers, not contained

Non-accepted products pose unfunded costs and safety risks to the system. To minimize their occurrence, the Plan relies on public education, collection site signage, and staff training. Any non-accepted material that enters the system is segregated during processing for special handling, adding to the overall cost pressures of the Plan.

6. COLLECTION AND MANAGEMENT SYSTEM

6.1. COLLECTION SYSTEM

Accepted products from sectors such as households, businesses, institutions, all levels of government, and commercial painters will be accepted through the collection system, regardless of brand. There will be no charge for accepting products at any collection facility.

Regulatory Requirement

39(g): a description of the manner in which existing collection and processing systems have been taken into account to maximize waste diversion in the Province

Paint has been managed under an established stewardship program in New Brunswick since 2009. This long-standing program is operated by Product Care and currently includes 64 permanent collection sites across the province (see [Appendix B](#) for a complete list of contracted collection sites). Product Care does not directly own or manage any collection sites, but contracts with a variety of collection sites, including Regional Service Commissions (RSCs), redemption centres, and paint retailers. The Program also participates in collection events managed by RSCs.

The current collection system has been built and refined over time based on collection performance data, geographic accessibility, and partnerships with both public and private sector stakeholders. The Plan is committed to providing reasonable access to services across the province, ensuring that New Brunswick residents can easily return leftover paint for recycling. The Plan will continue to optimize the collection system to ensure accessibility and convenience for New Brunswick residents. The Program will continue to rely on the current collection system while seeking ongoing opportunities for optimization to maintain accessibility and convenience for New Brunswick residents.

Experience has shown that consumers prefer a “one-stop shop” or to return/recycle products to where they purchased them. Leveraging this knowledge to maximize waste diversion, Product Care will also continue to seek to partner with existing businesses, local governments/regional service commissions, and recycling organizations and associations to provide collection services for paint.

All collection sites will accept the full range of accepted products (see Section 5) and will be listed and regularly updated on Product Care’s website.

Regulatory Requirement

39(e): information on service delivery to remote or rural areas

The collection system will provide reasonable and convenient service across the province, including remote and rural areas. To support this requirement, the Plan will be guided by the accessibility standard as set out in Section 10 - Performance Measures and Targets.

Regulatory Requirement

39(c): information on the province-wide collection system to be used by the consumer, including return facilities, by category of material

6.1.1. COLLECTION SITES

The Plan addresses this requirement for the two Categories of Material (undifferentiated).

All return collection sites will accept the full range of accepted products, as outlined in Section 5. Each site will be listed on Product Care's webpage through the recycling locator with details on their address and hours of operation. Any changes to collection sites will be updated on Product Care's webpage. Annual updates of the Plan's return collection sites will be provided within the annual report.

There is no charge to drop off accepted products. However, advance notice is requested for large-volume returns to ensure capacity and to allow for proper storage and handling at the collection site.

Product Care currently has a province representative that supports the Program, stakeholders, and its service partners, including collection sites and transporters. The province representative provides ongoing support to the collection network, to ensure that site staff have the proper information, tools and resource materials to operate. Collection sites will be visited at least once every two years to ensure the site is operating according to Product Care's NB Collection Facility Guidelines. Product Care will commit that any future province representative hired for the Plan will be bilingual, as required by Recycle New Brunswick.

A copy of Product Care's NB Collection Facility Guidelines (see [Appendix C](#)) is attached to this Plan for reference purposes only and does not form part of the Plan itself. The guidelines are subject to change. The most current version of the guidelines is available online on Product Care's Service Partner Resources webpage at www.productcare.org/service-partners/resources/.

6.1.2. COLLECTION EVENTS

If a community is deemed underserved based on the Plan's accessibility standard, and a permanent collection facility is not feasible, Product Care will aim to provide services through collection event(s). The number, location, and frequency of these events will be determined annually based on community interest and collection volumes.

6.1.3. LARGE VOLUME

The recommended drop-off limit for paint products is 10 containers or 50 aerosols per day. This guideline helps ensure safe handling and efficient service for all customers. Each collection site accepts materials based on what it is operationally able to manage, and some sites may accommodate larger quantities depending on available space and staffing. For customers with larger quantities, Product Care offers direct pickup services through its commercial collection program. Additional information and support are available by completing the Commercial Volumes Form on Product Care's website: [Commercial Volumes - Product Care Recycling](#).

Regulatory Requirement

39(a): information on the storage, collection, transportation, recycling, processing, disposal and other handling of designated material waste, including the designated material waste of other producers

39(d): the location of storage, recycling, processing, disposal and other handling facilities for designated materials

6.1.4. COLLECTION, CONSOLIDATION AND TRANSPORTATION

Collection

The Plan enters into contracts with each collection site, which cover respective roles and responsibilities. Collection Facility Guidelines are maintained by PCA and distributed to all collection sites. The guidelines include information on the following:

- Management requirements
- Accepted Product information
- Collection site requirements
- Operational procedures
- Reporting requirements

Collection sites collect and store accepted products in collection containers, such as tubskids and drums, provided by the Program. The Program coordinates transportation logistics for the collection system, arranging the drop-off of empty collection containers and the pick-up of full containers.

Transportation and Consolidation

Transporters contracted by the Program attend collection sites to pick up full tubskids/drums of collected products and to drop off empty tubskids/drums and any related supplies.

Full tubskids/drums are transported to a consolidation hub where full trailer loads are assembled for transportation to the processor, and emptied tubskids/drums are stored for redistribution to collection sites. The Plan may utilize consolidation facilities for temporary storage and to maximize transportation efficiencies by shipping full loads to the processor.

The Plan will track the number of tubskids of paint and drums of aerosols collected. Sorting of material collected will be performed and tracked at the time of material processing.

Product Care currently contracts with service providers to fulfill transport, consolidation, and temporary storage needs of the Plan, as detailed in Table 2. Product Care will notify Recycle NB within 10 business days of any changes to transportation or storage service providers.

Table 2: Primary Transporters, Consolidators, and Temporary Storage Information (subject to change)

Type of Collection Container	Transporter, Consolidator, and Temporary Storage Company	Location
Paint Tubskids	Hebert's New Brunswick	Miramichi, NB
	Try Al's	Saint John, NB
Aerosols Drums	Hebert's New Brunswick	Miramichi, NB
	GFL Environmental	Sussex, NB
	Try Al's	Saint John, NB

6.2. PAINT MANAGEMENT

Regulatory Requirement

39(a): information on the storage, collection, transportation, recycling, processing, disposal and other handling of designated material waste, including the designated material waste of other producers

39(d): the location of storage, recycling, processing, disposal and other handling facilities for designated materials

39(h): a management plan for designated material waste, by category of material, according to the following order of preference:

(i) reuse of the designated material;

(ii) recycling or composting of the designated material;

(iii) recovery of energy produced by the designated material; and

(iv) disposal of the designated material in accordance with the Act

39(o): a dispute resolution process to deal with disputes between a producer and a service provider

6.2.1. REUSE, RECYCLING, RECOVERY, AND DISPOSAL

The Plan addresses this requirement for both Categories of Material—Paint Materials Category and Container Materials Category—as described below. The Plan is committed to managing accepted products in accordance with the waste management hierarchy set out in Section 39(h) of the Regulation. The management approach depends on several factors, including product composition, condition of returned accepted products, availability of appropriate recycling technologies, qualified service providers, sufficient economies of scale, the existence of end markets for recovered materials, and broader market conditions.

Not all accepted products are suitable for reuse or recycling. In such cases, alternative management options are required. Where recycling or reuse is not feasible or when circumstances change, products may be managed through energy recovery, landfill, or incineration.

All accepted products under the Plan, including residual paint and empty containers, are managed using one or more of the following options:

Reuse - PaintShare

The PaintShare program allows consumers to pick up leftover paint, free of charge, from selected collection sites for reuse. For this program, returned paint that is in good, usable condition is set aside by collection site staff and made available to the public, helping to reduce waste by allowing the product to be used for its intended purpose.

Reuse is the most efficient way to manage leftover paint, as it avoids the need for additional transportation or processing. However, only a portion of the collected paint is suitable for reuse. Paint that is degraded (e.g. separated, solidified, or present only as skin or sludge) is not suitable for PaintShare.

Consumers receiving paint through the PaintShare program are required to sign a waiver and are informed that the contents are provided “as is,” with no guarantee of quality. Staff apply dedicated reuse labels to eligible containers before they are offered to the public.

As of June 2025, 25 collection sites in New Brunswick participated in the PaintShare program. Participation is voluntary and may be limited by available space, staffing capacity, or operational constraints at individual sites.

Product Care will continue to support and expand the PaintShare program where feasible.

Recycling

At paint processing facilities, collected materials are sorted and assessed for suitability for recycling. This includes both leftover paint and its empty containers. For the Paint Materials Category: Paint is separated by type – water-based, oil-based, and aerosol – and managed using available recycling technologies and infrastructure.

Water-Based Paint

For the Paint Materials Category: Water-based paint represents the majority of the architectural paint market in Canada. It continues to grow due to increased consumer awareness and green building practices. Returned water-based paint is evaluated for quality, colour, and composition. Where suitable, it is bulked and processed into recycled paint for resale through Canadian and international markets. However, not all returned water-based paint is of sufficient quality for “paint-to-paint” recycling.

Oil-Based Paint

For the Paint Materials Category: Oil-based paint currently represents a small portion of the market and is in decline, influenced by regulations on volatile organic compounds and shifting consumer demand. While recycling technologies for oil-based paint exist, the market is limited and continues to shrink.

Aerosol Paints

For the Paint Materials Category: The quantity of paint recovered from paint aerosols is very limited and consists of a variety of product formulations that limit the options for recycling. Paint aerosols typically contain propellants such as hydrocarbons or compressed gases (e.g., butane or propane) that are used to propel the paint out of the can when it's sprayed. These propellants are volatile and need to be safely removed and managed to prevent environmental harm. To be processed, paint aerosols are punctured, the contents drained, and the propellant captured in activated carbon filters. The activated carbon adsorbs the propellants, effectively removing them from the air and preventing their release into the atmosphere.

Empty Paint Containers

For the Container Materials Category: Empty paint containers are separated by material — steel or plastic — and processed accordingly:

- Metal containers (including paint aerosols containers) are generally recyclable, subject to market conditions.
- Plastic containers are recycled where viable; however, recycling feasibility depends on the availability of end markets and the condition and composition of recovered materials. When recycling is not feasible due to market constraints or the absence of suitable recycling options, materials are disposed of responsibly. Responsible disposal may include energy recovery or secure landfills.

Energy Recovery and Disposal

Not all accepted products collected through the Plan are suitable for recycling. Paints that are solidified, sludged, contaminated, formulated with high VOC content, or in otherwise poor condition are managed through energy recovery or disposal.

Energy Recovery

For the Paint Materials Category: Oil-based paints that cannot be recycled due to condition (e.g., sludge, skins, contamination) or formulation (e.g., high VOC content) are blended with other compatible fuels and sent to licensed energy recovery facilities, such as cement kilns.

Paint aerosols are punctured to remove residual contents, and propellants such as hydrocarbons or compressed gases are captured using activated carbon filtration. The residual paint is managed through energy recovery, and the empty metal containers are typically recycled.

Disposal

For the Paint Materials Category: Paint that is not suitable for recycling, including solidified or sludged material, is stabilized and sent to engineered landfill sites. In cases where oil-based paint contains PCBs or other hazardous substances, it is incinerated at permitted facilities to ensure safe management.

Container Disposal

For the Container Materials Category: While metal and plastic paint containers have historically been recycled, current market limitations, particularly for plastics, can restrict recycling opportunities. In cases where container recycling is not feasible, materials will be disposed of using the best available alternative following the waste management hierarchy. Responsible disposal includes management methods such as energy recovery or placement in a secure landfill that meets applicable environmental protection standards. Where disposal is required, the Plan will document the rationale and efforts made to recycle the material.

Non-Accepted Products

Non-accepted products that enter the system are segregated at the processing stage for shipment to a hazardous waste management company for processing and management.

6.2.2. PROCESSORS AND DOWNSTREAM FACILITIES

All accepted products collected through the Plan are sent to approved processing facilities. Residual paint is sent to the Laurentide Re-sources Atlantic Inc. facility in Richibucto, New Brunswick for initial processing, while paint aerosols are sent to the GFL Environmental facility in Sussex, New Brunswick. All accepted products collected and managed through the Plan are required to be sent only to approved downstream management options.

Facility Locations and End-Fate

Tables 3 to 4 detail processing facilities, management options, and locations.

Processing options and facility locations may change due to market conditions or the availability of recycling solutions. Product Care will notify Recycle NB within 10 business days of any change in service providers. Some of the listed facilities may not ultimately be used under the Plan.

Table 3: Primary Processing Site Information

Categories of Material	Location Address	Facility Type
Paint Materials Category	Laurentide Re-sources Atlantic Inc. 9322 Rue Main, Richibucto, NB E4W 4C7	Processing and Containment Facility
	Société Laurentide Inc. 345 Bulstrode Street, Victoriaville, QC G6T 1P7	Processing and Containment Facility
	GFL Environmental 17 Jones Court, Sussex NB E4E 2S2	Processing and Containment Facility
	Loop Recycled Paint 940 Chippawa Creek Rd, Niagara Falls ON L2E 6S5	Processing and Containment Facility
Container Materials Category	DR Metal Recycling 180 Edinburgh Dr, Moncton NB E1E 2K7	Processing Facility
	Sustane Tech Suite 110 3770 Kempt Road, Halifax, NS B3K 4X8	Processing Facility
	Everest Plastik 41 Exportation Street, Tracadie-Sheila, NB, E1X 1A2	Processing Facility

Table 4: Downstream Commodity Processing Locations and End-Fate

Categories of Material	Sub-Component	End-Fate	Downstream Processor or Contractor	Downstream Processor or Contractor Location
Paint Materials Category	Water-based paint	Recycle	Societe Laurentide Inc.	Shawnigan, QC
		Energy Recovery	Beauclair Environmental	Sherbrooke, QC
		Landfilling	Cumberland Landfill	Little Forks, NS
	Oil-based paint	Recycle	Societe Laurentide Inc.	Shawnigan, QC
		Energy Recovery	Beauclair Environmental	Sherbrooke, QC
	Aerosols Paint	Energy Recovery	Beauclair Environmental	Sherbrooke, QC
		Incineration	GFL Chateauguay	Chateauguay, QC
	Aerosols Propellants	Energy Recovery	Beauclair Environmental	Sherbrooke, QC
		Incineration	GFL Chateauguay	Chateauguay, QC
Container Materials Category	Aerosols Containers	Recycled	DR Metal Recycling	Moncton, NB
			Nova 4 Metals Recyclers	Amherst, NS
			AIM Recycling	Multiple locations (NB)
			Copal Metal Inc.	Ste-Julie, QC
			GFL Chateauguay	Chateauguay, QC
	Plastic Containers	Recycled	Sustane Tech	Halifax, NS
			Everest Plastik	Tracadie Sheila, NB
	Metal Containers	Recycled	DR Metal Recycling	Moncton, NB
			Nova 4 Metals Recyclers	Amherst, NS
			AIM Recycling	Multiple locations (NB)
			Copal Metal Inc.	Ste-Julie, QC

6.2.3. DISPUTE RESOLUTION

Product Care contracts with service providers by way of commercial agreements. These agreements include built-in dispute-resolution mechanisms. For disputes that arise related to the collection and management of paint during the operation of the Plan, Product Care's dispute resolution procedure follows 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.

6.3. ENVIRONMENTAL, HUMAN HEALTH, AND SAFETY RISK MANAGEMENT

Regulatory Requirement

39(1): a management plan for designated material waste, by category of material, which shall provide for the implementation of environmental and human health and safety standards, which shall meet or exceed those provided by applicable law

The Plan addresses this requirement on an undifferentiated basis for the two Categories of Material: Paint Materials Category and Container Materials Category. Product Care is cognizant of the need to minimize the potential of incidents that impact environmental and human health. Subsequently, Product Care diligently works with its partners (collection sites, transporters, and processors) to ensure compliance with environmental and safety regulations and the application of best environmental and safety practices with respect to collection, transportation, and processing of accepted products. Best practices describe procedures that protect people and the environment by ensuring safe handling, spill prevention, and regulatory compliance. These practices are described in the Collection Facility Guidelines.

6.3.1. TRACKING AND AUDIT

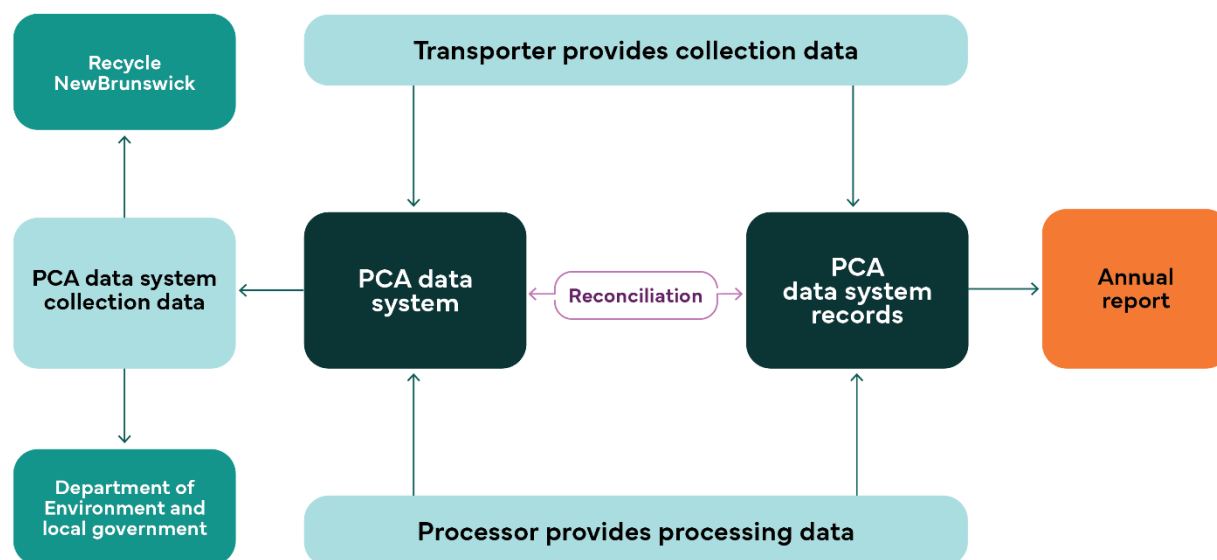
The Plan will utilize a database tracking and control system to record and track waste materials managed from point of collection to recycling and disposal.

Collection containers (tubs, drums) are tracked by the system. In addition, all processors and recyclers are required to track residual paint volumes collected, and how those volumes are managed, except paint aerosol residual paint volumes. For aerosol paint, residual volumes are estimated using established conversion factors applied consistently across reporting years to maintain comparability. The conversion factors were determined based on sampling done on both drums and individual aerosol containers found in tubs.

This data is recorded for reporting purposes.

The system employs best management practices and guidelines, including handling and safety requirements. The flow chart (see Figure 1) illustrates how information flows through the program—from collection to processing—and how this process ensures data integrity, consistency, and traceability across all stages of reporting.

Figure 1 Program Data Management Best Practices



6.3.2. ENVIRONMENTAL RISK MANAGEMENT

A necessary element of a tracking and audit system is environmental risk management. Product Care works with its partners (collection sites, transporters and processors) to ensure compliance with environmental regulations and the application of best environmental practices with respect to collection, transportation, and consolidation of leftover paint.

The environmental risk management system includes:

- System-wide shipping documentation and tracking system
- Due diligence reviews of depots, transporters, and recyclers to ensure compliance, as well as tracking system verification
- Requirement for detailed volume tracking and reporting, inventory control, and use of only established, reputable recyclers
- Development and maintenance of best management practices, including training, reporting, and guidelines etc. for collection sites and transporters
- Maintaining an environmental impairment insurance policy

6.3.3. CLEAN UP AND DECOMMISSIONING

The Program takes a preventative approach, as detailed in the Environmental Risk Management section. From Product Care's experience, the risk of environmental impact at collection sites or consolidation points is minimal because of the following:

- Paint is generally returned to the depots in the original consumer container
- Collection sites and transporters do not open containers

- Containers of paint are stored in leak-proof containers
- Paint tends not to migrate in the ground in the event of a spill
- Dried paint is not considered environmentally hazardous

Unless there is a major incident, the Plan does not anticipate any site mitigation required for the closure of collection sites.

6.3.4. EMERGENCY REPORTING

The Plan is committed to following Recycle NB's Emergency Reporting Clause in the event of any environmental emergency. In accordance with the clause, Product Care will notify both the New Brunswick Department of Environment and Recycle NB upon discovery of an environmental incident. A detailed written report will be submitted to Recycle NB within five days of the initial notification, outlining the nature of the incident, its impacts, mitigation actions taken, and measures to prevent recurrence.

7. DESIGN FOR ENVIRONMENT

7.1. PRODUCER EFFORTS TO REDUCE WASTE IN PRODUCT LIFECYCLE

Regulatory Requirement

39(i): a description of the efforts being made by the producer to redesign designated materials to improve opportunities for reuse and recycling

39(j): information on current and future research and development activities in the Province related to the management of the designated material

39(m): a plan for the elimination or reduction of the environmental impacts of designated material waste, by category of material

The Plan typically addresses these requirements for the two Categories of Material (undifferentiated), unless otherwise specified.

The objective of the Plan is to reduce the environmental impact of accepted products by promoting the pollution prevention hierarchy—reduce, reuse, and recycle—and by ensuring the responsible end-of-life management of these products. While the Plan fulfills its end-of-life obligations, it has limited influence over the upstream design of paint products or containers, as most producers operate in national or international markets. Nonetheless, industry trends and regulatory drivers continue to improve the environmental performance of both paint and its packaging.

Market-Driven Transition to Lower-Impact Paint Products

For the Paint Materials Category: The paint industry has undergone a major transformation over the past 15 years, transitioning away from oil-based paints toward water-based alternatives. This shift has been influenced by:

- Consumer demand for more environmentally friendly and safer products;
- Technological advancements in water-based coating formulations that deliver comparable performance to solvent-based systems;
- Regulatory pressure, including Environment Canada's VOC Concentration Limits for Architectural Coatings.

This transition has resulted in a reduction of approximately 44 kilotonnes of VOC emissions across Canada since 2006, with an estimated additional 4 kilotonnes reduced in recent years. Industry representatives estimate that low-VOC and VOC-free paints now account for the majority of all paint sold in Canada, especially in the architectural segment.

In parallel, producers are introducing bio-based formulations that incorporate plant-derived or renewable ingredients in place of petroleum-based materials. These formulations are expected to drive an additional 2 kilotonnes of VOC emission reductions over the next five years. Members of the Canadian paint industry also offer Greenguard-certified products, which meet rigorous third-party standards for low indoor emissions, enhancing consumer trust in sustainable choices.

Sustainable Packaging and Material Recovery

For the Container Materials Category: Packaging design is also evolving to support environmental goals:

- Many producers now use plastic containers with up to 15% recycled content.
- The industry has set a target of 50% recycled content in paint containers by 2030, aligned with national packaging reduction goals.
- Innovations such as flexible pouches and lightweight containers are being explored to reduce material inputs and transportation impacts.
- The industry is investigating alternative materials (e.g., cellulose, seaweed) to replace traditional plastics in some container applications.

In addition, for the Categories of Material (undifferentiated), the Plan utilizes the following tools to minimize the environmental impact of leftover paint:

- Applying variable EHF, which increase with the size of the container, to encourage consumers to buy the appropriate amount;
- Promotion to the consumer of the “B.U.D” rule, i.e. Buy what you need, Use what you buy, and Dispose of the remainder responsibly;
- Consumer education on the proper storage methods for leftover paint;
- Operation of the PaintShare program whereby leftover paint is made available to the public free of charge and
- Research into alternative management options for collected materials, with any related initiatives or outcomes described in annual reports.

Research and Development Activities

Product Care supports research activities that advance program effectiveness, such as the Atlantic Available to Collect study, where feasible and relevant to the New Brunswick Paint Program. The Atlantic Availability to Collect Study conducted in 2021 established an availability rate of 9.1%, which applies for the 2021–2026 period. A follow-up study will be conducted during the Plan period to reassess this rate.

Waste Composition Audits

To support evaluation of the Plan’s effectiveness in diverting all categories of materials from landfill, Product Care commits to participating in waste composition audits where appropriate. These audits will be undertaken in collaboration with the Province, Recycle NB, and other stewardship organizations. However, given the logistics, scope, and costs involved, it is important to retain flexibility regarding the number, timing, and methodology of such audits.

7.2. GREENHOUSE GAS (GHG) EMISSIONS

Regulatory Requirement(s)

39(n): a description of greenhouse gas emissions resulting from the implementation of the stewardship plan and opportunities to reduce environmental impact

The Plan addresses this requirement on an undifferentiated basis for the two applicable Categories of Material: Paint Materials Category and Container Materials Category.

Accepted Plan products have environmental impacts throughout their lifecycle—from the extraction and processing of raw materials, to manufacturing, packaging, transportation, and eventual disposal. Recycling leftover paint reduces some of these impacts by diverting material from disposal and decreasing the demand for virgin paint production.

While minimizing greenhouse gas (GHG) emissions is a priority, the implementation of a paint stewardship program inherently involves activities—such as transportation, consolidation, and processing—that contribute to GHG emissions.

The implementation of the Plan results in GHG emissions from the following activities:

- Transportation of collected paint and containers from collection sites and events to consolidation hubs and processors;
- Transportation of supplies and infrastructure (e.g., tubs, spill kits, signage) between collection sites and other Plan facilities;
- Mechanical processing and sorting of paint and packaging, including bulking and recycling;
- Transport of sorted or processed materials to downstream facilities (e.g., paint recycling plants, energy recovery facilities, metal/plastic recyclers, or landfills).

Product Care actively works to minimize the greenhouse gas emissions of paint recycling by:

- Utilizing existing collection and consolidation infrastructure to reduce the need for constructing new sites;
- Maximizing transportation efficiency by consolidating loads, optimizing collection routes, and partnering with logistics providers that apply route planning technologies;
- Encouraging the co-location of paint returns at sites already collecting other accepted products, where feasible;
- Supporting local recycling markets where available and offering equal or better environmental and economic benefits;
- Selecting processing technologies and partners that:

- Maximize recovery of materials, and
- Minimize energy consumption and waste.

However, opportunities to reduce GHG emissions are expected to be limited, given the current regulatory and operational context:

- Paint processing activities inherently require energy and generate emissions, particularly for tasks such as sorting, bulking, stabilization, or incineration;
- Transportation requirements are driven by accessibility obligations under the regulation, which necessitate a dispersed collection network and long-haul transport to consolidation and processing facilities, activities that inherently contribute to GHG emissions;
- Plastic container recycling is subject to volatile markets and infrastructure gaps, often requiring long-haul transport to viable recyclers;
- Limited availability of service providers and geographic constraints limit the ability to adopt lower-emission options within the Program's logistics chain, particularly in a jurisdiction like New Brunswick where market options are limited.

To meet the requirements of Section 39(n) of the Regulation, Product Care will, within the first two years of program implementation, develop a greenhouse gas (GHG) emissions framework to assess emissions associated with program activities and identify any opportunities for reduction where feasible. The framework will outline the scope of emissions, the emissions model, and the frequency and format of future reporting.

8. COMMUNICATIONS AND PUBLIC AWARENESS

Regulatory Requirement(s)

39(k): a communications plan to inform consumers about the stewardship plan, including

(i) information concerning reasonable and free access to a method of collection, and

(ii) a plan for education and awareness;

The Communications Plan outlines strategies for sharing information with consumers, including key messages, communication channels, and performance measurement.

It reflects the province's diversity by addressing the needs of English and French-speaking communities, as well as urban and rural populations. By tailoring strategies and collaborating with key stakeholders, the Program aims to maximize engagement across New Brunswick.

To support transparency and continuous improvement, Product Care will submit an Annual Communications Plan to Recycle NB by November 30 each year, starting in 2025 for 2026 activities.

Product Care will work with Recycle NB to ensure consistent messaging. All educational and promotional materials will be submitted for approval at least 15 business days before release. These materials will include Recycle NB's logo or a message confirming approval (for example, in radio ads).

Although not required by regulation, Product Care will provide all materials in both New Brunswick's official languages.

8.1. COMMUNICATIONS PLAN: RAISE CONSUMER AWARENESS ABOUT THE RECYCLABILITY OF PAINT IN NEW BRUNSWICK

Strategy 1: Online Information Hub

Product Care operates an online bilingual hub at productcare.org (English) / agrp.ca (French) to inform consumers, producers, and service partners about the Paint Recycling Program. The website is a key tool for meeting Section 39(k)(i) of the Regulation, by providing:

- A recycling locator with addresses and hours of collection sites
- Lists of accepted and non-accepted paint products
- Environmental handling fee details
- FAQs and contact information
- A link to Recycle NB's Paint Recycling page

Strategy 2: Advertising Campaigns

Advertising campaigns will be used to raise general public awareness about the recyclability of leftover paint. While paint is not a frequently purchased product, it is important that all residents—whether they use paint or not—understand that it can and should be recycled responsibly.

A broad, province-wide approach will be taken to ensure high visibility and long-term awareness. Multiple communication channels will be used to reach diverse audiences and reinforce key messages over time.

AUDIENCE	<ul style="list-style-type: none">• General public• Ages 18+• English and French speakers• Urban and rural markets as applicable
KEY MESSAGING	<ul style="list-style-type: none">• Leftover paint can be recycled and reused• Paint should not be thrown in the garbage or poured down drains, as it can harm landfills and waterways• Use the Plan's collection network for safe and responsible disposal• Clear information on which paint types are accepted and which are not• Free and accessible drop-off locations are available across New Brunswick
KEY PERFORMANCE INDICATORS (KPIs)	<ul style="list-style-type: none">• Reach• Impressions• Views
PRIMARY CHANNEL(S)	<p>Traditional channels may include:</p> <ul style="list-style-type: none">• Linear television• Print (e.g., bus wraps, billboards) <p>Digital channels may include:</p> <ul style="list-style-type: none">• Connected television• Social media (YouTube, Meta, etc.)• Paid Google ads and SEO campaigns

Strategy 3: Print Materials

Physical materials will be distributed to collection sites, to be made available to visitors. These existing 'recyclers' present an optimal audience given their existing behaviour and interest in recycling.

The print materials will:

- Educate consumers on which paint products are accepted
- Direct them to the online information hub for more details
- Be available in both English and French
- Include the Recycle NB logo

8.2. COMMUNICATIONS PLAN: INFLUENCE CONSUMER BEHAVIOUR TO RECYCLE PAINT

Strategy 1: Digital Advertising Campaign

The Plan will use digital advertising to reach consumers who are planning painting projects or researching how to dispose of leftover paint. By leveraging platforms like Google and social media, we can target individuals at key moments—when they are most likely to engage with recycling information.

AUDIENCE	<ul style="list-style-type: none">• Consumers, users of product• Ages 18+• French and English speakers• Urban and rural markets as applicable
KEY MESSAGING	<ul style="list-style-type: none">• Location and accessibility of paint collection sites across New Brunswick• Convenience of the drop-off process• Clear guidance on accepted and non-accepted paint products• Transparency into the recycling process and how materials are reused (circularity)• Free and responsible disposal through the Plan's collection network
KEY PERFORMANCE INDICATORS (KPIs)	<ul style="list-style-type: none">• Conversions (e.g., clicks to the recycling locator)• Website traffic
PRIMARY CHANNELS	Digital channels may include: <ul style="list-style-type: none">• Connected television• Social media (YouTube, Meta, etc.)• Paid Google ads and SEO campaigns

8.3. MEASUREMENT AND CONTINUOUS IMPROVEMENT

Communication activities promoting the Program will benefit from a continuous review of their efficacy and long-term viability.

Consumer Awareness Surveys

Utilizing a reputable third-party research firm, Product Care will conduct a consumer awareness survey every two years, starting in 2026, to gauge the effectiveness of communication efforts. The surveys will be representative of the entire adult population of New Brunswick and its demographic and geographical distribution.

9. AUDITING MECHANISMS

Regulatory Requirement

45(1)i: the annual financial statements, as prepared by an independent auditor, of the revenues received and the expenditures incurred in connection with the stewardship plan.

In each annual report, Product Care will provide the annual financial statements of the revenues received and the expenditures incurred through the Plan, as prepared and signed by an independent auditor.

10. PERFORMANCE MEASURES AND TARGETS

Regulatory Requirement

76(4): Each producer shall submit to the stewardship board a stewardship plan under this Regulation, including the performance measures and targets referred to in section 44, no later than June 30, 2025.

44(1): Each producer that is subject to a stewardship plan shall submit to the stewardship board for approval one or more performance measures and targets, by category of material, that the producer will use to assess the effectiveness of the plan.

10.1. PERFORMANCE MEASURES

Unlike some traditionally stewarded products, such as electronics and beverage containers, which are durable or frequently consumed, the Categories of Material, defined for this Plan, are consumable products used infrequently by consumers. Leftover paint is often stored rather than immediately viewed as waste requiring disposal. Additionally, typical program performance measures, when applied to paint products, are influenced by its long product life, market conditions, and evolving consumer behavior. Consequently, conventional performance measures are not considered applicable to paint products due to their distinct consumption and end-of-life characteristics.

To assess program effectiveness, the Plan will commit to a set of performance targets:

- Residual Paint Reuse Rate for the Paint Materials Category
- Container Recycling Rate for the Container Materials Category
- Accessibility performance for both Categories of Material (undifferentiated)
- Waste diverted from landfills for both Categories of Material (undifferentiated)
- Consumer awareness performance for both Categories of Material (undifferentiated)
- Recovery Rate for the Paint Materials Category

See details of these performance metrics and targets in section 10.1.1

To support understanding of program performance, Product Care will also report annually on a suite of additional measures. These measures are intended on identifying trends rather than absolute outcomes, recognizing the unique characteristics of paint and the broader plan context. It is important that these measures are not viewed in isolation but rather as part of a comprehensive evaluation. The Plan will utilize the following measures to highlight trends of program performance:

- Capture Rate
- Residual Recovery Volume
- Tubskid Count

10.1.1. PERFORMANCE MEASURES WITH TARGETS

Reuse and Recycling Rate

The Plan evaluates performance through:

- The Residual Paint Reuse Rate for the Paint Materials Category
- The Container Recycling Rate for the Container Materials Category

Residual Paint Reuse Rate

The Residual paint reuse rate reflects the percentage of waste residual paint processed through reuse and recycling, relative to the total volume of residual paint processed in a given year. In the context of waste paint, the term “reuse” includes any paint that is capable of being used by a consumer as paint.

$$\text{Reuse Rate for Residual Paint} = \frac{\text{Reuse volume (Paint Reuse)} + \text{Volume of residual paint recycled}}{\text{Total volume of residual paint processed}}$$

The Plan uses “paint volume processed” instead of “residual recovery volume” to calculate the residual paint reuse rate. Paint volume processed reflects the actual volume of residual paint processed by Product Care’s processors according to the available management options (i.e., reused, recycled, landfilled) in each period. The residual recovery volume is not used to calculate the reuse rate because not all the paint that is collected in one year is necessarily processed in that same year.

The reuse potential of residual paint can vary from year to year due to factors beyond the Plan’s control. Residual paint is a perishable material that can spoil if improperly stored, reducing its suitability for reuse. In addition, emerging product reformulations triggered by evolving regulatory requirements encouraging “greener” (e.g., lower-VOC) products may affect product shelf life and, consequently, recyclability/reusability.

The Program has consistently maintained a reuse rate for residual paint greater than 70%. However, the combined impact of the above factors may influence year-to-year variability in the volume of paint that is suitable for reuse. Taking these factors into account, the Plan commits to continue to achieve and maintain a target reuse rate of 74%.

Containers Recycling Rate

The ability to recycle containers is influenced by factors beyond the Program’s direct control. These include fluctuations in downstream market demand for recyclable plastics and metals. While the Program has maintained high recycling rates, year-to-year results may vary due to market-based factors.

Taking this into account, the Plan will track and report a Containers Recycling Rate. The Plan commits to achieving a 90% Containers Recycling Rate. Based on the following formula:

$$\text{Containers Recycling Rate} = \frac{\text{Weight of containers processed that are recycled}}{\text{Total weight of containers generated through processing}}$$

It is important to note that the amount of accepted products collected by the Plan that is reusable and/or recyclable is not within the Program’s control, but rather a function of consumer behaviour, including how long consumers hold onto the product, whether they seal and store it properly or leave it exposed to dry out, or contaminate it with other materials. Factors that can affect reuse & recycling rates include:

- Condition of returned paint
- Markets for materials

The Plan will continue to educate consumers on how to manage leftover paint properly to maximize the potential for reuse and recycling.

Accessibility

As mentioned in Section 6.1 (Collection System), Product Care will ensure that all New Brunswick residents have reasonable access to program services for both Categories of Material (undifferentiated). To do this, Product Care will maintain more than 60 permanent collection sites across the province and apply an interim accessibility standard of providing service within 30 minutes for urban areas and 50 minutes for rural areas during the first two years of program implementation, until a province-specific accessibility standard has been developed. The Plan commits to achieving a minimum of 95% accessibility coverage for New Brunswick residents during this period.

The accessibility standard will be established within the first two years of the Plan and will guide future network planning to ensure reasonable service coverage across the province including rural and remote areas. Where a permanent site is not feasible, Product Care will aim to provide service through a collection event(s) (subject to local demand and participation rate).

All collection sites will accept the full range of accepted products (see Section 5) and will be listed and regularly updated on Product Care's website. Each site will be visited at least once every two years to ensure staff have the proper information, tools, and materials to operate effectively.

Landfill Audit

The New Brunswick Department of Environment and Local Government (DELG) completed three waste audits in 2019 and one waste audit in 2023. Across these audits, regulated paint products represented a very small portion of the waste stream—typically between 0.2% and 1.3% (sampling results). Because the quantities are so small, results can fluctuate significantly from one audit to another due to normal sampling differences and the presence or absence of a small number of paint containers in the audited sample. Consequently, any extrapolation of these findings to the broader waste stream is subject to substantial extrapolation error.

Given this variability and margin of error, waste audit data cannot be used to calculate a reliable diversion rate for paint products. Instead, these audits serve only as a general indicator that paint continues to appear in very low amounts in the waste stream.

Product Care is committed to maintaining the low levels of paint observed in the waste stream audits and aims to remain at or below 1.5% (sampling results) for the two Categories of Material (undifferentiated).

Product Care will continue to support and participate in future waste audits led by DELG or other government authorities, where applicable.

Consumer Awareness

Since the launch of the New Brunswick Paint Recycling Program sustained outreach and education efforts have significantly increased public awareness for both Categories of Material (undifferentiated).

Awareness surveys are inherently subject to a degree of sampling error. All survey methodologies include a margin of error that can cause year-to-year fluctuations even when underlying awareness remains stable. For example, Product Care's awareness surveys typically carries a margin of error of approximately $\pm 3.5\%$. This means that small shifts in reported awareness levels may reflect normal statistical variation rather than real changes in program performance.

Historically, the Program's awareness results have been consistently high. To account for normal survey variability while maintaining strong performance expectations, the Plan commits to achieving and maintaining a minimum consumer awareness level of 82%.

Recovery Rate

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

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

The quantity of paint collected is derived from collection and processing data, while the quantity of paint sold is determined from sales reports provided by Plan members. Although recovery rate is one indicator of Plan performance, it is crucial to evaluate it in conjunction with other performance metrics due to factors beyond the Plan's control.

The recovery rate is a ratio of collected paint to sold paint which can be affected by various factors, such as market conditions, and consumer purchasing behavior. In addition, the Plan promotes the B.U.D. Rule, which encourages consumers to buy the proper amount (see section 7.1). This may result in lower amounts of leftover paint available to be collected and therefore a lower recovery rate – but this reflects a desired environmental outcome. For example, a decrease in the recovery rate may indicate improved Plan performance if consumers are using paint more efficiently. Additionally, the paint collected in a given year is not necessarily from paint sold in the same year, as consumers may store paint for extended periods before disposal. As a result, annual recovery rates can fluctuate for reasons unrelated to the Plan's effectiveness.

At the request of RNB to include either a recover rate, capture rate or waste diversion rate target, the plan is selecting a recovery rate target for this Plan.

Given the conditions above, the Plan commits to achieving a recovery rate of at least 5.3% for the Paint Materials Category.

10.1.2. ADDITIONAL REPORTING PERFORMANCE MEASURES

The following performance measures will be reported annually to support ongoing program evaluation. These metrics are intended to identify trends and provide context for interpreting program performance.

Residual Recovery Volume

Reference to volumes of residuals collected as a measure of program performance presents some unique challenges in the context of accepted products. Unlike some other stewarded products, such as tires and electronics, accepted products are consumable products that don't necessarily have an expiry date after which they are no longer usable. Studies have shown that residents tend to keep accepted products in their possession for years after initial use. Accepted Products are only considered waste at the point where the consumer no longer values it or determines they no longer have any use for it. Factors such as the consumable nature of the product, varied product life expectancy, and consumer behaviour make it difficult to evaluate Plan performance based on residual volumes. Residual recovery volume (RRV) represents the actual quantity of residual paint collected by the

Program, measured in litres. In the context of paint, both an increase and decrease in RRV can suggest improvements in Plan performance. An increase in RRV shows that more paint is being recovered. However, a decrease in RRV can be an indication that consumers are being more efficient in the use of their paint and exercising the B.U.D. rule. Therefore, while RRV is acknowledged as an indicator of Plan performance, it must not be evaluated in isolation but in context with other metrics, such as the accessibility of the network and consumer awareness. Product Care will continue to analyze these metrics to improve the Plan continuously. The Plan will continue to report the residual recovery volumes in the annual report.

Capture Rate

The Capture Rate represents the proportion of paint collected by the Plan relative to the estimated volume of paint available for collection in a given year. It is calculated by dividing the Recovery Rate by the estimated availability of paint, which is informed by consumer storage behavior and disposal patterns:

$$\text{Capture Rate} = \frac{\text{Recovery Rate}}{\text{Available to Collect Rate}}$$

Product Care will continue to report on the Capture Rate as a performance indicator. However, it should be interpreted alongside other Plan metrics, given the inherent uncertainty in estimating the volume of paint available for collection. Observing trends in the Capture Rate over time may help validate patterns shown by other indicators and provide additional insight into overall Plan performance. A holistic evaluation of the Plan is best achieved by considering multiple performance measures rather than relying on any single metric in isolation.

Tubskid Count

The Plan utilizes plastic reusable pallet-sized containers for the collection and transportation of leftover paint. Tubskid volume provides an alternative volumetric measure of the recovered product. As with other indicators, tubskid count should be used in combination with other measures to assess program performance. For example, in some years, the Program collects fewer tubskids compared to the previous year, however, sometimes the residual recovery volume could be higher from fewer tubskids. As with the recovery rate, tubskid count can fluctuate year to year based on factors beyond the Program's control, including market conditions and consumer behaviour. The Program will report on the number of tubskids collected annually.

10.2. PLAN PERFORMANCE MEASURES AND TARGETS

Table 5 outlines the Plan's performance measures and targets for the Categories of Material: Paint Materials Category and Container Materials Category, as described below.

Table 5: Plan's Performance Measures and Targets

Performance Measures	Target	Categories of Material
Reuse Rate for residual paint	74% reuse rate	Paint Materials Category
Recycling Rate for Containers	90% recycling rate	Container Materials Category
Awareness	82% consumer awareness levels	Categories of Material (undifferentiated)
Accessibility	Maintain more than 60 permanent collection sites and ensure 95% of residents have access within 30 minutes (urban) and 50 minutes (rural) during the first two years, until a province-specific accessibility standard is finalized. Follow the accessibility standard once approved	Categories of Material (undifferentiated)
Landfill Audit	Maximum 1.5% (sampling results)	Categories of Material (undifferentiated)
Recovery Rate	5.3% Recovery rate	Paint Materials Category

11. ANNUAL REPORT REQUIREMENTS

11.1. COLLECTION DATA REPORTING

Regulatory Requirement(s)

39(f): the geographic areas to be used for the purposes of the annual report

The Plan will utilize collection data organized by geographical areas that align with the 12 Regional Service Commissions (RSC) for the purposes of the annual report.

Regional Service Commissions:

- Northwest Regional Service Commission (RSC 1)
- Restigouche Regional Service Commission (RSC 2)
- Chaleur Regional Service Commission (RSC 3)
- Acadian Peninsula Regional Service Commission (RSC 4)
- Greater Miramichi Regional Service Commission (RSC 5)
- Kent Regional Service Commission (RSC 6)
- Southeast Regional Service Commission (RSC 7)
- Kings Regional Service Commission (RSC 8)
- Fundy Regional Service Commission (RSC 9)
- Southwest New Brunswick Service Commission (RSC 10)
- Capital Regional Service Commission (RSC 11)
- Western Valley Regional Service Commission (RSC 12)

11.2. ANNUAL REPORT COMMITMENTS

Table 6 outlines the performance measures that will be used to track the Plan's performance. As required by Section 45(1) of the Regulation, the Plan will report on each of the following measures on an annual basis for the previous calendar year by May 31st.

Table 6: Annual Performance Measures and Reporting Commitments

Performance/Reporting Measures	Reporting Commitment	Regulation
Paint sold	Report annually on total liters sold, for the Paint Materials Category	45(2) at the same time a producer submits its annual report, the producer shall provide to the stewardship board a statement in writing specifying the total amount of designated materials, by category of material, distributed by the producer during the previous calendar year or during the period approved by the stewardship board
Paint collected	Report annually on the total estimated amount of paint collected by Category of Material: Paint Materials Category: <ul style="list-style-type: none"> Residual Paint (litres) Residual Aerosol Paint (litres) Container Materials Category: <ul style="list-style-type: none"> Metal Containers (tonnes) Plastic Containers (tonnes) 	45(1)a) the total amount of designated material waste, by category of material, collected: (i) in the Province, or (ii) in the geographical areas specified in the stewardship plan;
	Report annually on the total estimated amount of paint collected by Regional Service Commission for the Category of Material: Paint Materials Category. Reporting on: <ul style="list-style-type: none"> Residual Paint (tubs/kids) Residual Aerosol Paint (drums) 	
Collection sites	Report annually on the number and location (community and Regional Service Commission) of contracted collection sites.	45(1)b) a description of collection systems used and the location of return facilities, if any
Collection events	Report annually on the number and location of collection events.	

Performance/Reporting Measures	Reporting Commitment	Regulation
End fate management	<p>Report annually on the amount of designated material waste that was reused, recycled, recovered for energy, stored, processed, disposed of, or otherwise handled, by Category of Material:</p> <p>Paint Materials Category:</p> <ul style="list-style-type: none"> • Water-based Paint • Oil-based Paint • Residual Aerosol Paint <p>Container Materials Category:</p> <ul style="list-style-type: none"> • Metal Containers • Plastic Containers 	45(1)c) the amount of designated material waste, by category of material, that was reused, recycled, composted, recovered for the purposes of energy, stored, processed, disposed of or otherwise handled;
End fate processes	<p>Report annually a description of the end fate processes used to manage the handling of designated material waste by Category of Material.</p> <p>This will include a description of how the following are managed:</p> <p>Paint Materials Category:</p> <ul style="list-style-type: none"> • Water-based Paint • Oil-based Paint • Residual Aerosol Paint <p>Container Materials Category:</p> <ul style="list-style-type: none"> • Metal Containers • Plastic Containers 	45(1)d) a description of the types of processes used to reuse, recycle, compost, recover energy from, store, process, dispose of or otherwise handle designated material waste, by category of material;
End fate facilities	Report annually the location of any storage, processing, or handling facilities for paint.	45(1)e) the location of any storage, processing or handling facilities for designated material waste;
Design for environment	Report annually on the efforts to redesign paint to improve opportunities for reuse and recycling, for both Categories of Material (undifferentiated).	45(1)f) a description of the efforts to redesign designated materials to improve opportunities for reuse and recycling, by category of material;
Consumer awareness	Report annually on the types of consumer information, educational materials and strategies undertaken by the Plan.	45(1) g) the types of consumer information, educational materials and strategies adopted by the producer;
Consumer awareness survey	Conduct consumer awareness survey every two (2) years starting in 2026.	
Program website visits	Report annually on user visits to the program's website.	
Plan assessment	The Plan's effectiveness will be assessed annually against the performance measures and the targets (see Table 5 Plan's Performance Targets) that were approved or imposed by the stewardship board.	45(1)h) an assessment of the effectiveness of its stewardship plan against the performance measures and the targets that were approved or imposed by the stewardship board;

Performance/Reporting Measures	Reporting Commitment	Regulation
Financial statements	Report annually the audited financial statements of the annual statement of revenues and expenses incurred in connection with the stewardship plan.	45(1)i) the annual financial statements, as prepared by an independent auditor, of the revenues received and the expenditures incurred in connection with the stewardship plan;

APPENDIX A: REGISTERED PRODUCERS

List of producers (as of November 26, 2025) who have registered with Recycle NB and designated Product Care as their PRO to operate the New Brunswick Paint Stewardship Plan on their behalf.

Name of Applicant	RNB ID
1439174 Ontario Ltd (NLS Products)	RNBP76
3M Canada Company	RNBP83
Acklands - Grainger Inc.	RNBP78
Alexandria Moulding	RNBP88
Amazon.com.ca ULC	RNBP89
AMRE Supply Canada Inc.	RNBP96
Avanti Sports Group Inc.	RNBP61
BASF Coatings Inc.	RNBP79
Bass Pro Canada ULC	RNBP095
Behr Process LLC	RNBP009
Benjamin Moore & Co. Ltd.	RNBP016
Bestbuy Distributors Ltd	RNBP87
Canadian Building Restoration Products, Inc	RNBP004
Canadian Tire Corporation, Limited	RNBP038
Cansel Survey Equipment Inc.	RNBP84
Class C Solutions Group, MSC Industrial Supply LLC	RNBP93
Cloverdale Paint Inc.	RNBP050
Comfort & Stuff imports Ltd.	RNBP85
Country Chic Paint	RNBP094
CRC Canada Co.	RNBP92
Denalt Paints Ltd.	RNBP086
Diamond Vogel Paints Inc	RNBP90
Dover Finishing Products	RNBP117
Ducan Products Inc.	RNBP001
Dynamic Paint Products Inc. DBA Lancaster Canada	RNBP007
Farrow & Ball Canada Ltd.	RNBP65
Fastenal Canada Ltd.	RNBP73
Forrest Paint Co. US\$	RNBP036
Groupe BMR inc.	RNBP81
Henry Company Canada, Inc.	RNBP012
Home Depot of Canada Inc.	RNBP052
Home Hardware Stores Limited	RNBP022
Homestead House/Fusion Mineral Paint	RNBP103
IRL Supplies (2011) Ltd.	RNBP82
Jaguar Land Rover Canada ULC	RNBP102
John Deere Canada ULC	RNBP088
Kent Building Supplies	RNBP037

Name of Applicant	RNB ID
K-G Spray-Pak Inc.	RNBP029
Kleen-Flo Tumbler Industries Ltd.	RNBP005
Kubota Canada LTD	RNBP106
Lawson Products, Inc.	RNBP86
Loop Recycled Products Inc.	RNBP68
Michaels Stores Inc.	RNBP083
Modern Sales Co-op	RNBP69
Motion Industries (Canada), Inc.	RNBP71
Orgill Canada Hardlines ULC	RNBP72
OSMOSE PENTOX INC.	RNBP116
Laurentide Re-sources Inc.	RNBP119
Peintures MF Inc.	RNBP020
PPG Architectural Coatings Canada Inc.	RNBP006
Princess Auto Ltd.	RNBP66
Produits de Plancher Finitec Inc.	RNBP043
RONA Inc.	RNBP097
Rust-Oleum Canada	RNBP034
Saman Corporation (3777472 Canada Inc.)	RNBP035
SCP Distributors Canada	RNBP101
Selectone Paints Inc.	RNBP047
Seymour of Sycamore, Inc.	RNBP040
Sherwin-Williams Canada Inc	RNBP098
Sika Canada Inc.	RNBP011
Soprema Inc.	RNBP027
Techniseal	RNBP044
TENAQUIP Limited	RNBP74
The Houtshop Inc.	RNBP91
The Sansin Corporation	RNBP041
The Sherwin-Williams Company	RNBP024
Timber Pro Coatings Ltd.	RNBP096
UAP INC.	RNBP64
UCP PAINT INC	RNBP70
Uline Canada Inc.	RNBP115
Uni-Select Inc	RNBP118
Wal-Mart Canada Corp.	RNBP026
Wesco Distribution Canada LP	RNBP114
White Cap Supply Canada Inc.	RNBP104
Whaleco Canada Inc.	RNBP128
Wood Essence Distributing	RNBP049
Wurth Canada	RNBP77

APPENDIX B: LIST OF CONTRACTED COLLECTION SITES

List of contracted collection sites, as of November 26, 2025.

Collection Site Name	Address	City	PaintShare
Airport General Store	4105 Loch Lomond Road	Saint John	No
Baie Ste Anne Home Building Supplies	6 Ch Riviere du Portage	Baie-Sainte-Anne	No
Betts Home Hardware Building Centre	420 Main Street	Doaktown	No
Billy's Bottle Exchange & Salvage	524 Darlington Drive	Dalhousie	Yes
Billy's Bottle Exchange (Atholville)	15C Boom Lane	Atholville	Yes
Blackville Home building Centre	80 Main Street	Blackville	No
BMR D.E Landry (formerly RONA #2125)	1976 Rue Commerciale	Saint-Francois-de-Madawaska	No
BMR Parent - Kedgwick (formerly RONA #7786)	115 rue Notre-Dame	Kedgwick	No
BMR Parent - Saint-Quentin (formerly RONA #7200)	38 Chemin Labrie	Saint-Quentin	No
Boyd Bros. Home Hardware Building Centre	#9 - Route 172	St. George	No
Brooks Redemption Center	496 Campbell Settlement Rd	Nackawic	Yes
Caissie Home Hardware Building Centre	11301 rue Principale	Rogersville	No
Canadian Tire Oromocto	345 Miramichi Road	Oromocto	No
Caraquet Centre De Renovation Home Hardware	42 Blv St-Pierre Est.	Caraquet	No
Centre de remboursement de Memramcook	280 Old Shediac Rd	Memramcook	No
Centre de Remboursement SAMJ	6416 Route 17	Saint-Quentin	Yes
Centre De Remboursement Shippagan Les Iles Inc.	4008 Route 113	Lamèque	No
Centre de Transbordement	220 rue de L'entreprise	Tracadie	No
Chaleur Regional Service Commission - Redpine Landfill	1300 Route 360	Allardville	No
Dulux Paint (Fredericton, Store #8451)	947 Prospect Street	Fredericton	No
Dulux Paint (Moncton, Store #8513)	674 St. George Blvd.	Moncton	No
Dulux Paint (St John, Store #8469)	144 Thorne Ave	St. John	No
Dupuis Home Hardware Building Centre	8 Ch Pont Rouge	Memramcook	No
East Main Market	77 East Main Street	Port Elgin	No
Fredericton Region Solid Waste Commission Landfill	1775 Alison Blvd	Fredericton	No
Fundy Regional Service Commission - Crane Mountain Landfill	10 Crane Mountain Road	Fredericton	No
Golden Mile Redemption Centre Ltd.	35 Linton Road	Saint John	Yes

Collection Site Name	Address	City	PaintShare
Gorbers Bottle Exchange Ltd.	216 High Street	Moncton	Yes
Grand Bay Redemption Centre	301 Highland Road	Grand Bay-Westfield	Yes
Grange Design	1263 Rue Principale	Beresford	No
Hampton Recycling Centre	401 William Bell Drive	Hampton	No
Hebert's Bottle Exchange & Scrap Metal	293 Wellington Street	Miramichi	Yes
F.A.R Recycling	110 Steeves St.	Hillsborough	Yes
Horsman's Bottle Exchange Inc.	3493 Route 106	Salisbury West	Yes
J&L Warehousing Inc.	500 Blvd. de L'Acadie	Edmundston	Yes
Keith's Building Supplies	169 Route 1	St. Stephen	No
La Societe Cooperative de Lameque Ltee	68 rue Principale	Lamèque	No
Le Legumier de Madawaska	13790 Rte 144	Rivière Verte	Yes
Maison du Tapis	832 Boulides Acadiens	Bertrand	No
Mapleview Redemption Center	182 Route 385	Weaver	Yes
Norrad's Express and Redemption Centre Ltd.	40 Albert Street	Sussex	Yes
Northside Redemption Centre	213 McFarland Street	Fredericton	No
Northwest Regional Service Commission Landfill	248 Clement Roy Rd.	Rivière Verte	Yes
Pub's Redemption Centre	346 Rothesay Ave	Saint John	Yes
Recyclage Chaleur	571 Rue De L'Industrie	Petit-Rocher	Yes
Richibucto Home Hardware Building Centre	45 Cartier Blvd	Richibucto	No
Roblynn Home Hardware Building Centre	257 Restigouche Road	Oromocto	No
RONA Edmundston	595 Rue Carrier	Edmundston	No
Saint Antoine Home Hardware Building Centre	4612 Rue Principale	Saint-Antoine	No
Shediac Redeem Center	610 Main St	Shediac	Yes
Southeast Regional Service Commission - Eco360 Waste Management Facility	100 Enviro Drive	Moncton	No
Southern Valley Transfer Station	155 Moffatt St	Woodstock	Yes
Southside Redemption Centre	70 Timothy Avenue	Hanwell	Yes
Southwest New Brunswick Service Commission - Hemlock Knoll Landfill	5749 Route 3	Lawrence Station	No
Tediche Home Hardware Building Centre	2499 Acadie Road	Cap-Pelé	No
Tri-R Redemption Centre	16 Lewis Street	Oromocto	No
Vail's Bottle Exchange	522 Main St.	Woodstock	Yes

Collection Site Name	Address	City	PaintShare
Valley Redemption Centre	665 Babin Street	Dieppe	Yes
Valley Redemption Centre - Collishaw	323 Collishaw St.	Moncton	Yes
Valley Redemption Centre - Quispamsis	1 Market Street	Quispamsis	Yes
Valley Redemption Centre - Toombs	88 Toombs St.	Moncton	Yes
Village of Grand Manan Transfer Station	9 Curling Club Road	Grand Manan	No
Watson's Home Building Centre	2686 Route 3	Harvey	No
Wheaton's All in One	13 Industrial Drive	Sackville	Yes

APPENDIX C: COLLECTION FACILITY GUIDELINES

DISCLAIMER

The Collection Site Guidelines (“Guidelines”) are intended to provide guidance to operators participating as a collection site in the New Brunswick Paint Stewardship Program.

The practices described in the Guidelines are not intended to replace any standards, acts or regulations required under Local, Provincial or Federal law; nor are the Guidelines intended to relieve the collection site operator or staff of requirements under the law.

Product Care Association (“PCA”) accepts no responsibility and assumes no liability resulting from the incorrect use of information contained in the Guidelines or from the use of this information in any circumstances other than those described.

Forms provided in the Guidelines may not be current due to changes in processes, regulations and procedures. Updates will be provided to your collection site as required and posted on the www.productcare.org website. Please ensure you are using the most updated version.

The collection site is a place of work regulated by the WorkSafe NB. In addition to the Guidelines, collection sites must comply with all environmental, health and safety regulations to ensure workers are properly trained and equipped for their work and they understand the:

- Hazards they may encounter in their work;
- Safety practices needed to protect themselves from harm; and
- Actions they may need to take in the event of an emergency, such as a spill or fire.

Products handled under the Program are dangerous goods. The handling, offering for transport or transportation of dangerous goods is regulated under the Transportation of Dangerous Goods (TDG) Regulations. Some or all parts of the regulations may apply to your operations. Further information should be provided by your supervisor.

Further information about environmental requirements for designated materials can be obtained from Recycle New Brunswick (RNB). Further information about workplace safety can be obtained from your local WorkSafe NB office.

QUICK REFERENCE SHEET

Contact Information

Product Care Association (PCA)

Toll Free: 1.888.772.9772

Email: nbpaintrecycle@productcare.org

PCA Local Program Coordinator

- Don Shea
- 506-640-1886
- Email: don@productcare.org

Shipment Requests (Hebert's)

- Phone: Toll-free: 1.888.773.1880 or 506-773-1880
- Email: nhare.hr@bellaliant.com
 - Copy nbopspaint@productcare.org
- Fax: 506.773.1881

Ordering Communication Materials

Phone: 1-888-772-9772

Fax: 604.592.2982

Website: <https://www.productcare.org/service-partners/promotion-and-education>

In Event of a Spill

Phone (Product Care Association): 1.888.772.9772 (24 hours) – Ext 213 (Operations Manager)

Recycle New Brunswick

Toll Free: 1-888-322-8473

Email: info@recyclenb.com

Important Information

Websites:

www.productcare.org (for service providers)

Important Forms

The Guidelines include several important forms to use and photocopy as needed:

- Paint Reuse (formerly Paint Exchange) Form (see APPENDIX A)
- NB Paint Monthly Inspection Form (see APPENDIX B)
- Emergency and/or Incident Report Form (see APPENDIX C)
- NB Paint Collection Site Guidelines Quiz (see APPENDIX D)

Keep Important Records On Hand

The following records must be kept in a secure location so they can be produced when requested by a Product Care representative or a regulatory compliance officer:

- Bills of lading
- Monthly inspection forms
- Emergency and/or incident reports
- Training records
- Paint Reuse Liability Forms



NOTE: Keep these records for a minimum of two years

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LIST OF ABBREVIATIONS

NB	New Brunswick
BoL	Bill of Lading
GHS	Global Harmonization System (formerly WHMIS)
PCA	Product Care Association
PPE	Personal Protective Equipment
RNB	Recycle New-Brunswick
TDG	Transportation of Dangerous Goods
WHMIS	Workplace Hazardous Materials Information System

GLOSSARY OF TERMS

Program Products	Products accepted at collection sites operating under an agreement with PCA
Guidelines	Collection Site Guidelines (FKA Collection site Manual)
Program	New Brunswick Paint Stewardship Program

1 PAINT RECYCLING PROGRAM

Product Care Association of Canada (“PCA”) manages the Paint Stewardship Program in NB. The Program allow consumers to return leftover household paints through local collection sites.

PCA is a federally incorporated; not-for-profit product stewardship association formed in response to stewardship regulations and is governed by a multi-sector industry board of directors.

The products collected through the Program are those included within the New Brunswick Regulation 2024-37 (“Regulation”) under the Province’s Clean Environment Act. This is **NOT** a government-run program.

PCA encourages consumers to do their part in protecting our environment by using the following practices (B.U.D.):

- **B**uy only the amount of paint needed for the job.
- **U**se as much as needed.
- **D**rop off what’s left at a recycling location near you.

The Program is funded by Environmental Handling Fees (also referred to as EHF or Eco-Fees), and therefore products where an Eco-Fee has not been paid are not acceptable in our program. This program is:

- Not meant for industrial products, except aerosol paint.
- Not meant for Non-Household Paint products (for example roofing products, etc.).
- Meant for **POST-CONSUMER** products **ONLY** (no materials that are returned to stores or not yet sold).

Additional Information Contact

For more information regarding the Program, or if you have any questions after reading the Guidelines, please contact:

Operations Manager
Product Care Association
Tel: 604.592.2972 or Toll-Free 1-888-772-9772 x213
Fax: 604.592.2982
Email: OM@productcare.org

2 RESOURCES

Regulations

Collection sites must adhere to all legal requirements. The following is a list of applicable regulations.

Federal Transportation of Dangerous Goods Act/Transportation of Dangerous Goods Regulation: Federal Transportation of Dangerous Goods Regulations (TDG Regulations) applies to all dangerous goods transported from collection sites. The collection site operator must sign the Manifest/Movement Document provided by the transporter and keep their copy at the collection site for 2 years.

NB Regulation 2024-37: This regulation sets out the obligations for stewardship programs in the province. For further information refer to the regulations at <https://laws.gnb.ca/en/document/cr/2024-37>

2.1 Forms and Records

Bill of Lading (BoL): Every shipment of paint from a collection site must be accompanied by a BoL. The transporter will supply a pre-filled BoL for every shipment from a collection site. An example of a BoL is illustrated in Figure 8 (p.20) and should be kept by the collection site for a minimum of two years per regulatory requirements.

Monthly Collection Site Inspection Form: Is to be completed monthly, on or before the 10th of each month, and mailed, emailed or faxed to PCA's Operations Coordinator (contact details are on the form) and is illustrated in Appendix B.

3 RESPONSIBILITIES

3.1 Collection Site Operator

As the operator of a collection site, you are responsible for ensuring that:

- The requirements described in the Guidelines are applied correctly at the collection site.
- Employees overseeing the collection of paint products have read the Guidelines and successfully completed the NB Paint Collection Site Guidelines Quiz (see Appendix D) to demonstrate they know the practices they must follow.
- Report to PCA, any faulty equipment belonging to PCA or any damage to PCA's equipment (tubskids, lids, drums, etc.)

Change of Collection Site Information

Collection sites must provide PCA written notice a minimum of 30 days in advance of any changes to operating hours, location, ownership, etc. See Appendix E for the Collection Site Notification Form.

3.2 Collection Site Employee

All collection site employees are responsible for ensuring their work is performed correctly. Employees must:

- Take part in any instruction or training offered.
- Have read the Guidelines and successfully completed the quiz.
- Be aware of and apply the work practices and requirements described in the Guidelines correctly.
- Report any condition to their supervisor and/or collection site operator that may be dangerous.

4 COLLECTION SITE SET-UP

4.1 Access to the Collection Site

The collection site must be open for the public during regular business hours to return leftover products. Please see section 4.4 for more details regarding this signage.

4.2 Storage Space Requirements

Paint Products

The storage area must have a minimum of two tubskids (two 4'x4'squares) for storing products. All accepted program non-aerosol paints are placed in a tubskid. Tubskids for collecting paint can be stored inside or outside in a secure (fenced) area. Frost affect the recyclability of paint. When possible, store the paint inside to prevent it to freeze.

Aerosol Paint Products

All aerosol paints, including automotive and industrial paints, are placed in the "AEROSOLS" drum. Drums for collecting paint aerosols can be stored inside or outside in a secure (fenced) area.

4.3 Supplies

Important Forms

The Guidelines includes several important forms to use and photocopy as needed:

- Emergency and/or Incident Report Form (see Appendix C)
- NB Paint Monthly Inspection Form (see Appendix B)
- NB Paint Collection Site Guidelines Quiz (see Appendix D)
- Paint Reuse Form (formerly Paint Exchange) (see Appendix A)
- Collection Site Notification Form (see Appendix E)

Collection Materials

PCA supplies the collection site with the following equipment:

- Storage containers
 - Tubskids
 - Drums (these are provided for the collection of paint aerosols)
- Safety equipment

FIGURE 1: TUBSKID CONTAINER AND UN RATED DRUM



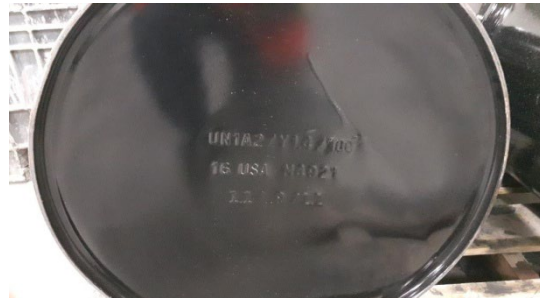
Tubskid



Drum



UN drum stamp on side



UN drum stamp on bottom

FIGURE 2: SAFETY EQUIPMENT



Spill Kit

IMPORTANT:

- All equipment remains the property of PCA and must be returned upon closure of the collection site.
- Report any damaged equipment (tubskids, lids, drums) or service requirements.
- Approval is required for equipment maintenance.
- Only use equipment provided by the program for the program.
- PCA provided equipment is NOT to be used for any other reason



NOTE: PCA does **NOT** provide personal protective gear that may be required by WorksafeNB safety regulations for your place of work, such as protective clothing, safety shoes, hard hats or special equipment that may be needed in a fire or other emergency.

4.4 Communication Materials and Collection Site Signage

Ordering Communication Materials

Communication materials may be obtained by phone (1-888-772-9772) or fax (604.592.2982) or through our website at <https://www.productcare.org/service-partners/promotion-and-education/>. If ordering online, choose your province and program when ordering information materials and they will be shipped to you.

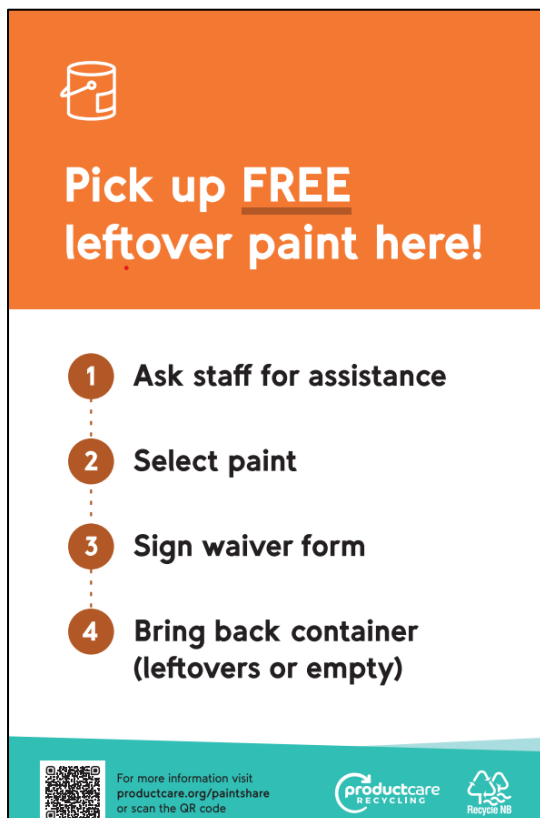
PCA provides the following communications materials*:

- Sign
- Rack cards

*Signs and card may be different than pictured in manual due to updates.

The sign must be placed in a highly visible location near the paint collection area.

FIGURE 3: COLLECTION AREA SIGN



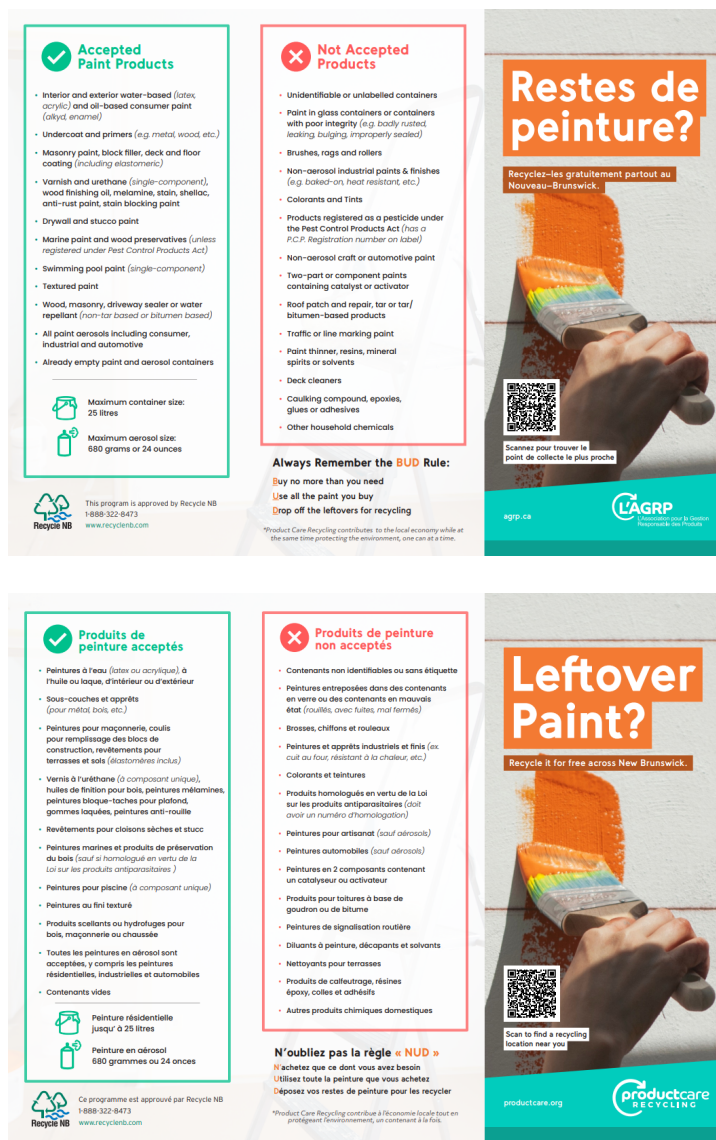
Promotional Materials

PCA supplies promotional materials (brochures, rack cards, etc.) containing important information about the Program and the products that may be returned.

The rack card offers information about the Program, including a list of accepted products and encourages the consumer to follow the B.U.D Rule: **B**uy what you need, **U**se what you buy, **D**rop off any leftovers for recycling.

Card holders to hold these rack cards are also available and can be requested when ordering rack cards.

Figure 4: Rack Card Front (left) and Back (right)



4.5 Security & Access

When the collection site is closed or not attended, people or animals must be prevented from accessing the site to ensure that stored products are protected from incorrect handling or damage. All collection containers must be either secured inside a locked and fenced enclosure or inside the collection site.



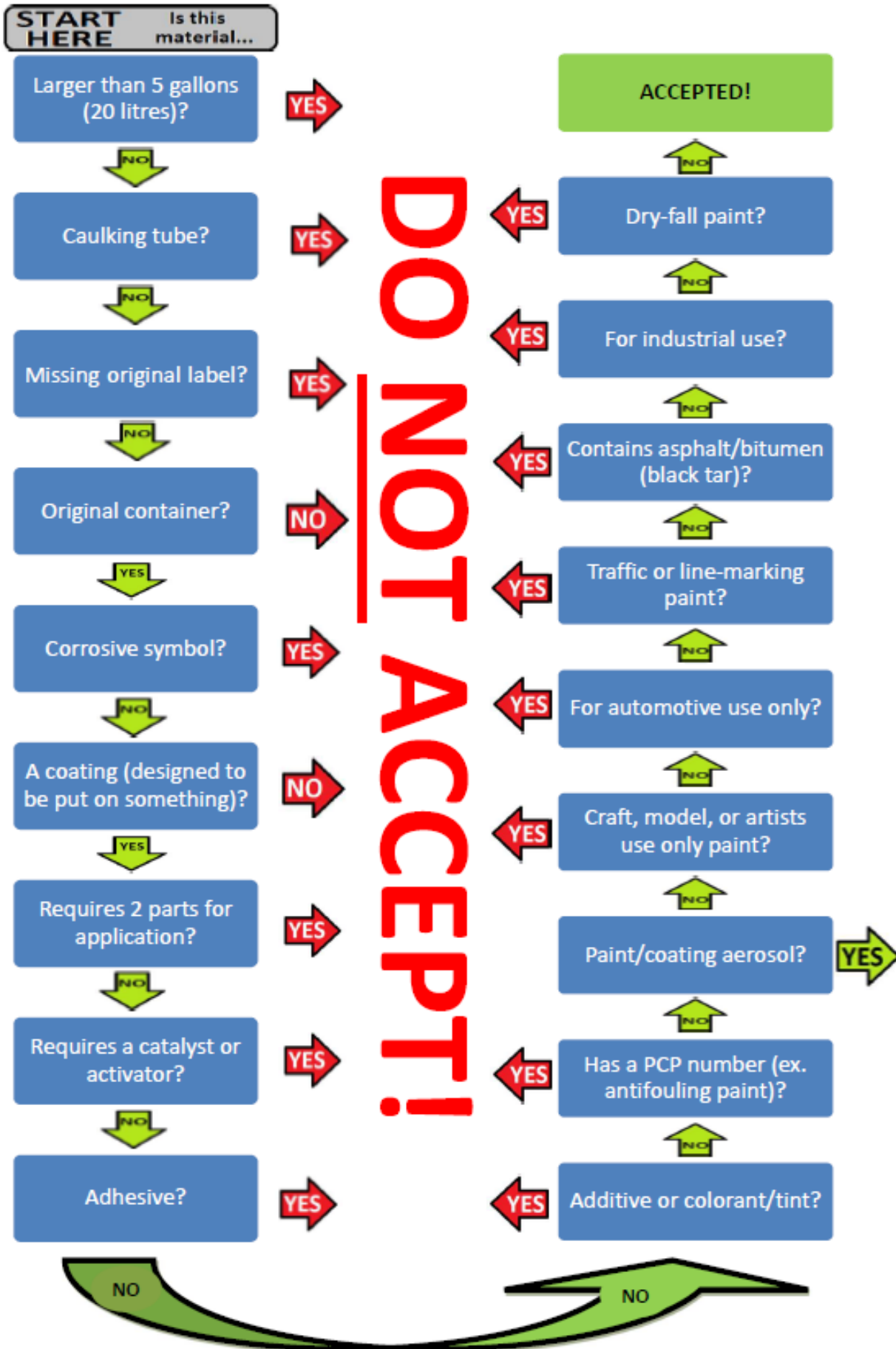
NOTE: Do **NOT** allow public access to the collection area without supervision.

The paint tubskids should be located in an area that is relatively flat, on solid ground, have easy access for staff and trucks for shipment. It is preferred to have the paint tubskids on paved ground.

Abandoned Materials

If items are abandoned on-site after hours, take them inside, inspect and sort appropriately. Products not accepted by the Program that are abandoned on-site must be disposed of through an appropriate method. For advice on how to manage this material, contact your local regional service commission.

PAINT ACCEPTANCE FLOW CHART



5 ACCEPTED AND NOT ACCEPTED PRODUCTS

5.1 Products We Accept

Paint products accepted by the Program are architectural (household) paints and coatings in labeled containers under 25 litres (5 gallons) in size and all aerosol paints (automotive, craft and industrial). There are two main types of architectural paints sold to consumers: latex (water-based, often titled “acrylic”) paints and alkyd (oil-based) paints. Both types are accepted by the program regardless of the sheen (gloss, eggshell, matte), or transparency.

ALL containers accepted for collection must:

- In original container for the product.
- Have original, manufacturer labels, clearly identifying their contents.
- Be contained if they are leaking, have poor container integrity, or unsealed



WARNING: An improperly sealed container can pose a fire, health and safety and environmental risk. **NO** containers should be opened on site.

Paint Products Accepted by the Program:

- ✓ Interior and exterior water-based (e.g. latex, acrylic) and oil-based (e.g. alkyd, enamel) architectural paint
- ✓ Deck, porch and floor coating (including elastomeric)
- ✓ Varnish and urethane (single-component)
- ✓ Concrete and masonry paint
- ✓ Drywall paint
- ✓ Undercoats and primers (e.g. metal, wood, etc.)
- ✓ Stucco paint
- ✓ Marine paint (unless registered under Pest Control Products Act)
- ✓ Wood finishing oil
- ✓ Wood preservatives (unless registered under the Pest Control Products Act)
- ✓ 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)
- ✓ Already empty paint containers

Maximum size: 25 litres (5 gallons)

Paint Aerosols Accepted by the Program:

- ✓ Paint aerosols of all types including automotive, craft and industrial products
- ✓ Empty paint aerosol containers

Maximum size: 680 grams (24 ounces)

5.2 Products Not Accepted

The following products are **NOT** accepted by the Program:

- ✗ Unlabelled containers
- ✗ Brushes, rags and rollers
- ✗ Paint not in their original containers (e.g. glass jars)
- ✗ Leaking or improperly sealed containers that are not contained for transport
- ✗ Mixed paint (e.g. oil-based with latex)
- ✗ Unidentifiable, unknown or unlabelled products
- ✗ Industrial paint and finishes
- ✗ Paints or wood preservatives that are registered as a pesticide under the Pest Control Products Act (has a P.C.P Registration number on the label)
- ✗ Non-aerosol craft paint
- ✗ Automotive paint (non-aerosol)
- ✗ 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, fibre-glass
- ✗ Paint thinner, mineral spirits or solvents
- ✗ Deck cleaners
- ✗ Colourants and tints
- ✗ Caulking compound, epoxies, glues or adhesives
- ✗ Other household chemicals
- ✗ Nitro-cellulose based paints and lacquers
- ✗ Lubricants, oils and antifreeze

See Appendix F for detailed photos of products not accepted by the program.

Additional training is available at our Member Support Page on our website www.productcare.org

It is illegal to send unacceptable product to PCA for Disposal.

6 COLLECTION SITE OPERATIONS

6.1 Receiving and Handling Products from Consumers

Receiving, Examining and Handling Products

1. Before accepting a product, examine it to ensure it is:
 - Accepted Program Product.
 - In its original container and clearly labelled.
 - The container is sealed and leak proof (i.e. not dented such that the lid will not seal, or so rusty that it can easily be punctured).
 - Be contained if it is leaking, has poor container integrity, or unsealed
2. If the paint is suitable for the Paint Reuse Program, put it aside for reuse (see section 6.4 on Paint Reuse). Otherwise, if the container is acceptable, either place it directly into a tubskid or in a transfer area so designated.
3. At regular intervals, take the products from the transfer area and place them in the correct collection containers.



NOTE: This Program is **NOT** a self-drop system. Do **NOT** let consumers place products directly into tubskids. They may choose the wrong collection container, drop off unacceptable items or may pack the products incorrectly.

Drop-Off Volumes

If a customer returns a large number of items that are more than your site can handle:

1. Accept what you can manage.
2. Ask the customer to return another time with the remainder of the items.
3. Direct the customer to contact PCA in the future if they have large numbers of items to return.

If you accept large volumes that hinder your day-to-day collections, PCA cannot guarantee immediate service.



WARNING:

NEVER open a product to see what is inside.

NEVER transfer or pour products on site.

NEVER open a container to verify its contents.

NEVER guess at what is contained inside the container.

Wear appropriate gloves and personal protective equipment when handling products.

Dealing With an Unacceptable Product

DO **NOT** accept unacceptable product.

1. Provide the consumer with a PCA rack card.
2. For designated materials (tires, oil & glycol, electronics, pharmaceutical products & medical sharps, beverage containers, packaging and paper, batteries, lamps), direct the consumer to call Recycle New Brunswick for information regarding alternative disposal.

Recycle New Brunswick

Toll Free: 1-888-322-8473

Email: info@recyclenb.com

3. For Household Hazardous Waste (HHW) products, direct the consumer to the specific Regional Service Commission that accepts HHW products.

6.2 Storing Products

Paint products must be stored safely to ensure that containers are not knocked over, spilled or create a risk of fire.

Rules for packing tubskids:

- Pack all products with the lids upright so they do not leak or spill.
- When packing tubskids, pack heavy items at the bottom with additional smaller products packed on top.
- Do not mix regular paint and aerosol paint cans. Place aerosol paints **ONLY** into a drum designated for aerosol paints.
- Pack the tubskid as tight as possible. This helps to keep containers in place and avoids spillage.
- Never overfill a tubskid. Make sure the lid sits flat on top.
- Always keep lids on tubskids to protect the contents from rain and snow.
- Make certain to identify any damaged equipment to PCA, including tubskid lids.



IMPORTANT: All paint products must be stored in the correct tubskids at the end of each business day.

FIGURE 5: CORRECTLY PACKED TUBSKIDS



6.3 Shipping and Transport

Requesting a Shipment

Shipments should be ordered when:

- Half of the tubskids on your site are full
- The aerosol drum is three-quarters full

To request a pickup, please contact the hauler of the Program (Hebert's)

- Phone: Toll-free: 1.888.773.1880
NB: 506-773-1880
- Email: nhare.hr@bellaliant.com
 - Copy nbopspaint@productcare.org
- Fax: 506.773.1881

When ordering a shipment for pick-up please indicate:

- Your collection site name and address
- Your name
- Number and type of collection containers (tubskid or drum)
- Number and type of product (paint and/or aerosol)
- Any supplies required (spill pads or socks for refilling spill kit, Paint Reuse and/or tubskid labels, placards, etc.)

Depending on your location, allow up to 7 business days for a pick-up.

It is important to contact the transporter for a pick-up prior to filling all your empty collection containers. If you do not have any empty collection containers remaining to receive acceptable products, you must discontinue accepting products until empty collection containers arrive. Explain to the public that this is for environmental and safety reasons and that they can return at a later date with their products. Continuing to accept products after all your tubskids or drums are full and storing the products on the ground or elsewhere increases the potential for spills, which in turn increases environmental risk and safety concerns. The collection site may incur a severe penalty should a spill occur or risk of closure.

Preparing Tubskids for Shipping

Complete the following steps when preparing collection containers for pickup:

- Pack tubskids following the directions in 6.3 of the Guidelines.
- Keep the loading area clear.



FIGURE 6: LABELS

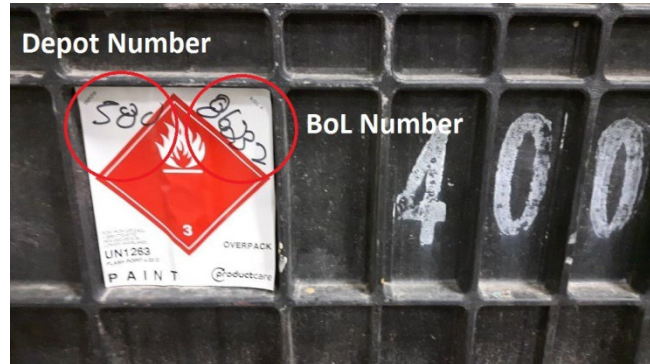


FIGURE 7: LABEL PLACEMENT AND INFORMATION

- Write the collection site number and the BoL number on hazardous (tubskid) labels.
 - This information can be found on the BOL that is either provided by PCA prior to the pick up or provided by the driver at the time of pickup. More information on documentation is provided below.
- Complete the labels for paint (Class 3) or aerosols (Class 2.1), per requirements (see below) and place on the appropriate collection containers for shipping (Figure 7).
 - This is a requirement under the *Transportation of Dangerous Goods Regulation*. The labels have the product name on the bottom of them.
- The hazardous (tubskid) label is to be placed to the left of the tubskid number on the outside of the tubskid.
 - Please see Figure 7 for tubskid label placement.
 - If the label will not stick to the outside of the tub, please use an additional adhesive such as spray glue.
 - Please do not place the tubskid label (or subsidiary label) on the lid or inside the tub, change the size of the labels or cut the labels in half.
 - Under no circumstances should you ship full tubskids without the correct labels.
- Complete the shipping document and sign.
 - By signing the shipping document (bill of lading – BoL), you are declaring that the goods shipped are as indicated and the markings on the label are correct. Ensure you understand the statement at the bottom of each BOL you are signing to ensure shipments are compliant with the *Transportation of Dangerous Goods Regulations*.

NOTE: Do **NOT** overfill tubskids. Lids must fit tight and be level in order for loads to be properly secured for transport. To ensure this, do not stack products above the rim of the tubskid. If a lid cannot be closed, the transporter will either ask you to put the overflow into a different tubskid or will refuse to accept it.


You may be required to assist the transporter to load and unload. Ensure a forklift (or other loading equipment) is available to assist the transporter.

Documentation & Visual Identification

The following documents are associated with the collection of program products:

- Bill of Lading (BOL): this is the shipping document (**Figure 8**)
- Collection container labels (Figure 7)
- TDG Placards (see Figure 9)

Figure 8: Bill of Lading


BILL OF LADING

BoL Number
90425

Plant: 7781 Vantage Way, Delta, BC V4G 1A6
Tel: 1-888-772-9772 Fax: (604) 592-2982

BILL OF LADING NO. 90425

CARRIER Vanguard Bottle Depots Ltd.				PERMIT NOS.			
STREET 1175 Derwent Way				DISPATCHER Gavin			
CITY Delta	PROV BC	PC V3M 5V9	PHONE 604-520-0333	FAX 604-520-0363			

CONSIGNOR (FROM) Save the planet, Recycle Everything depot				CONSIGNEE (TO) Product Care			
STREET 1111 60 avenue				STREET 7781 Vantage Way			
CITY Surrey	PROV BC	PC	CITY Delta	PROV BC	PC V4G 1A		
PHONE			FAX			PHONE 604-592-2972	
						FAX 604-592-2982	

Depot Number

100

FROM SHIPPER:							
NO. OF PIECES	DESCRIPTION OF RESIDUAL / ARTICLE	DG	UN #	SHIPPING NAME	CLASS	PG	VOL UNIT
	N/A		NA	NA	NA	NA	n/a
	N/A		NA	NA	NA	NA	n/a
	Aerosol Paints	X	UN1950	AEROSOLS	2.1		L
	Paint (Flash Point <23)	X	UN1263	PAINT	3	II	L

Enter Quantity Shipping

Estimate Volume

Description of material shipping

TO SHIPPER:				
NO. OF PIECES	DESCRIPTION OF ARTICLE	WT.	UNIT	COMMENTS
	n/a			
	n/a			
	DRUM, Empty, UN Approved		Kg	
	Empty Tubsids		Kg	

24-HOUR NUMBER	PLACARD REQ.	PLACARD TYPE	QUANTITY
CANUTEC 1-888-226-8832	NO		

Dangerous Goods Permit No. SU 6811 and SU 7133 - expiry date: May 31, 2019

SHIPPER		CONSIGNEE		CARRIER		DRIVER NAME	DRIVER NO.
Save the planet, Recycle Everything		Product Care		Vanguard Bottle Depots Ltd.			
Name (Please Print)		Name (Please Print)		Name (Please Print)		TRAILER	
PER.		PER.		PER.		UNIT	PIECES
DATE	TIME	DATE	TIME	DATE	TIMES-START	- AT SITE	- FINISH TIME

I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, are properly classified and packaged, have dangerous goods safety marks properly affixed or displayed on them, and are in all respects in proper condition for transport according to the Transportable Dangerous Goods Regulations.

Print and Sign Above

White Copy - Shipper • Yellow Copy - Transporter • Pink Copy - Consignee

FIGURE 9: TDG PLACARDS



Class 2.1 placard



Class 3 placard

The transporter will have the BOL, the required collection container labels, and the placards with them at the time of pick up. As required by the TDG Regulations, make sure that:

- The shipment matches the information found on the BOL.
- The appropriate collection container labels are attached to each shipping container.
- The appropriate placards are supplied to the transporter.

When the transporter picks up the products, you must:

- Provide a signature, date, and time of pick up on the shipping documents.
- Keep a copy of the shipping documents for your records.
 - For collection sites that receive paperwork directly from PCA, fax or email a copy of the signed BOL to PCA.
- If requested, open tubskids for the driver to verify the contents.
- Ensure a staff member is available to handle these requirements to avoid shipping delays.

Document Retention

It is important to keep copies of all documents associated with products collected under the Program. The BOLs are required to provide proof to PCA of products collected and to confirm that the monthly payments are accurate. All documents should be kept for a minimum of two years per regulatory requirements.

Shipment Quick Reference Sheet

To Request Pickup:

- Phone: Toll-free: 1.888.773.1880
NB: 506-773-1880
- Email: nhare.hr@bellaliant.com
 - Copy nbopspaint@productcare.org
- Fax: 506.773.1881

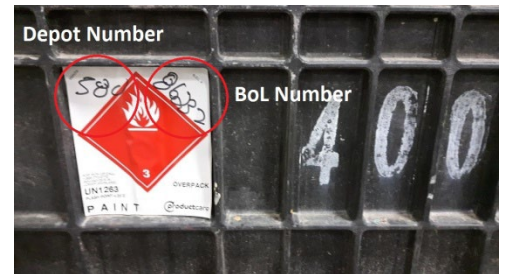
When ordering a pick-up please indicate:

- Collection site name and address
- Your name
- Number of containers, product type and container type
 - Type: Paint or Aerosol, and if it's a tubskid or a drum
- Any supplies required (spill pads or socks for refilling spill kit, Paint Reuse or tubskid labels, etc.)



Preparing collection containers for pickup:

- Tubskids - Packed correctly. NOT overfilled, not above the rim, lids must fit tight.
- Write the Collection site # and the BOL Number on labels.



- Complete the shipping document, sign and date the BoL.
 - Shipment matches the BoL.
 - Placards are used.
 - Keep a signed copy of BoL

Make sure that:

- You have enough labels for the products
- That the amounts and types of tubskids match what is already pre-filled on the BoL.
- If quantities do not match do not ship extra items.
- Label each tubskid. Labels provided
- Give placards to the driver

BoL Number 00425

Product Care **BILL OF LADING**
Plant: 7781 Vantage Way, Delta, BC V4G 1A6
Tel: 1-888-772-8772 Fax: (604) 592-2882

BILL OF LADING NO. 00425

CARRIER Vanguard Bottle Deposits Ltd.		PERMIT NOS.	
STREET 1175 Dorwest Way		DISPATCHER Gustin	
CITY Delta	PROV BC PC V3M 5V9	PHONE 604-520-0333	FAX 604-520-0363
CONSIGNOR (FROM) Save the planet. Recycle Everything depot		CONSIGNEE (TO) Product Care	
STREET 1111 60 avenue		STREET 7781 Vantage Way	
CITY Surrey	PROV BC PC	CITY Delta	PROV BC PC V4G 1A
PHONE	FAX	PHONE 604-592-2972	FAX 604-592-2982

FROM SHIPPER:

NO. OF DESCRIPTION OF RESIDUAL / ARTICLE	DD	UN #	SHIPPING NAME	CLASS	PG	VOL UNIT
N/A		NA	NA	NA	NA	n/a
N/A		NA	NA	NA	NA	n/a
Aerosol Paints	X	UN1950	AEROSOLS	2.1		L
Paint (Flash Paint -23)	X	UN1263	PAINT	3	II	L

Enter Quantity Shipping **Estimate Volume**

Description of material shipping

TO SHIPPER:

NO. OF DESCRIPTION OF ARTICLE	DD	UN #	COMMENTS
n/a			
n/a			
DRUM, Empty, UN Approved		Ka	
Empty Tubskid		Ka	

24-HOUR NUMBER 1-888-226-8832 **PLACARD REG.** NO **PLACARD TYPE** QUANTITY

Dangerous Goods Permit No. SU 6811 and SU 7133 - expiry date: May 31, 2019

SHIPPER Save the planet. Recycle Everything		CONSIGNEE Product Care		CARRIER Vanguard Bottle Deposits Ltd.		DRIVER NAME		DRIVER NO.	
Name (Please Print)		Name (Please Print)		Name (Please Print)		TRAILER			
PER		PER		PER		UNIT		PIECES	
DATE		DATE		DATE		TIMES-START		FINISH TIME	

I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, are properly classified and packing have dangerous goods safety marks properly affixed or displayed on them, and are in all respects in proper condition for transport according to the Transportable Dangerous Goods Regulations.

Print and Sign Above

White Copy - Shipper • Yellow Copy - Transporter • Pink Copy - Consignee

6.4 Paint Reuse Program

The Paint Reuse program (formerly Paint Exchange) allows consumers to take selected containers of leftover paint from the collection site free of charge.

By signing up for the Paint Program you are also enrolled in representing the Paint Reuse program. The Paint Reuse program is a popular initiative that helps to protect the environment while at the same time supporting consumers happy with using leftover paint for their small home projects.

Collection sites are encouraged to provide shelving for reusable, leftover paint. Place shelving in a visible and easily accessible location for customers, but within sight of staff.



Do **NOT** let customers open paint containers.



Examples of Paint Reuse storage areas

Paint Reuse must be supervised at all times to reduce liability, health and safety and environmental risks.



NEVER allow the consumer to take paint from a tubskid or open the cans on site. Most returned cans of paint have been used, so there are almost always markings and labels on the can indicating the colour and type of the paint within.

NEVER provide any other products for Paint Reuse. Aerosols, pesticides and flammable liquids are **NOT** permitted for reuse.

This program is advertised on the Productcare.org website along with your collection site information.

As the operator, you are authorized to select paint cans received that appear to be still suitable for reuse and staging them in a well-marked area for consumers to collect them free of charge. Consumers must be made aware that the paint is on a “AS IS” basis and quality cannot be guaranteed. They must read the Paint Reuse form prior to signing it.

Paint Containers Suitable for Paint Reuse

- Select paint containers only in good condition with no rust or damage. Do not give away aerosols or non-paint items.
- Select 4 litres containers or larger **ONLY**.
- Shake container to ensure its contents are still liquid (**NOTE: Do NOT open the container.**)
- Select containers that are >50% full (**NOTE: Do NOT open the container.**)



NEVER Open cans to verify contents.

Paint Reuse Rules:

- Paint is offered on a “AS IS” basis. There is no quality guarantee.
- Do not allow consumers to open any containers.
- Containers may be returned if the consumer does not like the quality or colour.

Procedure for Taking Paint

1. Have the consumer read and understand the Paint Reuse Label orange waiver label before signing the form.
2. Have the consumer complete the information required on a Paint Reuse form (Appendix A):
 - a. Use blue or black, ball-point pen.
 - b. Print your collection site name and full collection site address at the top of the form.
 - c. Have consumer fill in the date, their name, signature and phone number.
 - d. Determine if the paint is latex (water-based) or alkyd (oil-based).
 - e. Record the number of containers taken based on paint type and container size.
 - f. At the end of the page, add up the total number of containers taken.
 - g. Stop writing when all lines are used. Start a new form, even if all the items are for one person.
3. Attach an orange paint Reuse sticker to each can (see Figure 10). It is best to put the label on top of the can (over the lid) so that it doesn't cover the instructions and warnings.

FIGURE 10: PAINT REUSE STICKER IN USE



Waiver Sticker



Waiver Sticker on can

Send completed Paint Reuse forms to PCA via email to nbopspaint@productcare.org or via fax to 604-592-2982 no later than the 10th of the following month. See Figure 11 and APPENDIX A for an example of a Paint Reuse form.

[illegible]

Collection site staff must physically inspect all Program equipment, including signs, tubskids and safety supplies such as the spill kit contents. The staff must also check inventory on such items as promotional materials, tubskids, etc. A copy of the monthly inspection form is provided in Appendix B. For additional copies, photocopy the form.

Email the completed form to PCA following the instructions at the top of the form. Forms must be received before the 10th of the following month.

6.6 Health & Safety Hazards



NOTE: If your company/organization has its own Health and Safety Program and Emergency Plan, follow those instructions. This section is only provided as an additional reference.

General safety guidelines for handling paint:

- No smoking near the paint collection and storage area.
- Do **NOT** open paint containers.
- Do **NOT** accept unknown materials.
- Do **NOT** accept non-program materials.
- Only accept leaking, cans with poor integrity, or unsealed containers if they are made leakproof.
- Read the label on each container to confirm the product is accepted by the program.
- Follow basic hygienic procedures.
- Follow the procedures outlined in these Guidelines.

Tripping Hazards

Since products must be carried from the customer vehicle to the staging area, and then to the collection containers, pathways must be well lit and clear of obstructions.

Lifting Hazards

Removing products from a customer's vehicle and/or staging areas and placing them in collection containers requires bending and lifting. Handling containers incorrectly could result in injury. To reduce the chance of injury, use the following precautions:

- Bring objects near to the body when lifting and do not try to lift at arm's length.
 - Bend the knees and keep the back straight.
 - Never try to lift more than can be lifted safely. Ask for assistance if needed.
-

Hazard Symbols

Depending on the type of paint, the label may display warning or hazard symbols. The following are some common product hazard signs found on paint containers:

Poison Hazard



This symbol is a warning that the product could be toxic if you inhale its vapours, if you accidentally swallow it or if it makes contact with your eyes or skin.

Avoid breathing vapours, ingestion and skin contact.

Explosive Hazard



A compressed gas is a product whose contents are under pressure (e.g., an aerosol can).

Do **NOT** throw the container and store the product in appropriate containers. It may be dangerous if the container is accidentally heated, punctured or crushed.

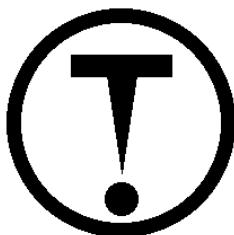
Flammable Hazard



Alkyd (oil-based) paint typically contains flammable or combustible ingredients, which means these materials will ignite and continue to burn if exposed to a flame or source of ignition.

Avoid breathing in fumes, build-up of vapours, open flame, spark or heat, ingestion and skin contact.

Toxic Hazard



This symbol is a warning that the product has other affects that could be toxic over time or with consistent exposure.

Avoid ingestion and skin contact.

Protection from Other Hazards

At the collection site, there may be physical hazards such as moving vehicles or objects that could fall and cause an injury. These hazards are different in every collection site so it is very important for the operator to identify them and ensure workers can take necessary precautions.

First Aid

A first aid program is required in all places of work. First aid requirements are regulated by WorkSafeNB and depend on the type of business and the number of workers present.

7 EMERGENCIES

7.1 Emergency Planning

It is important for the operator and collection site workers to know what actions must be taken in case of a fire or spill. The correct emergency action depends upon the location of the collection site and whether a local fire department is able to respond. Accordingly, please follow your own emergency plan if you already have one and use this as a reference.

7.2 Emergency Training

If collection site workers are given responsibilities in an emergency, they should be instructed in their assigned duties, including the correct use of emergency equipment or emergency procedures. They should also practice the correct response actions on a regular basis. Your local fire department may be able to assist in this training.

7.3 Fire

Every work site should have a fire plan in place. The following are some suggestions for procedures in case of a fire.

- Ensure safety by evacuating the site and moving everyone to a predetermined safe location up wind of the fire.
- Call the fire department.
- If it is safe to do so, use a fire extinguisher to put out the fire.
- Report the fire to the program office at the number shown on the list of Emergency Contacts.
- Complete the Emergency and/or Incident Report form and send it to the program office immediately, when it is safe to do so



NOTE: Your local fire department will be able to assist in recommending fire incident procedures for your site.

7.4 Dealing with a Spill

It is important that all collection site workers know the correct steps to take in the event of a spill where a product is dropped or damaged during handling. Spill response depends on the product type and quantity spilled. A paint spill does not require the same level of action as a gasoline, flammable liquid or pesticide spill.

Spill Kits

PCA provides each collection site with a spill kit to deal with emergency spills of program products. It is the operator's responsibility to ensure the spill kit contains all of the required supplies originally provided and is accessible to collection site staff at all times.

Figure 12 provides an example of a spill kit. Spill kits come equipped with:

- 1x disposal bag
 - 1x spill response mini poster
 - 2x 4' universal socks
 - 50x oil pads
-

FIGURE 12: SPILL KIT SUPPLIES



Spill Clean-up

In the event of a spill, take the following steps:

1. **CARE:** Ensure personal safety by evaluating the spill or incident. For spills that can be managed by collection site staff, put on appropriate protective gear and secure the area.
2. **CONTROL:** Stop the flow by placing the spilling container in a position where the least amount will spill. Examples: an open container on its side would be placed upright, placing the leaking container into another container, or placing a spill sock around the container to catch the spill.
3. **CLEAN-UP:**
 - Use the materials in the spill kit to contain and clean up the spill.
 - Collect all the spilled material with absorbent and place it in the plastic bag(s), along with any used spill control supplies, contaminated protective clothing and cleaning materials.
 - Seal the plastic bag(s) containing the recovered spilled material.
 - Label the bag(s) to identify the contents and contaminants and place it in the collection container that the spilled container would have been packed into.
 - Remove any contaminated clothing. Wash thoroughly to remove spilled material from your hands or body.
 - Replace any used spill control supplies. Additional replacement supplies can be ordered from PCA (indicate so on your Incident Report form).
4. **REPORT:**
 - Report all spills where the spill kit supplies are used, and all other incidents involving program materials or program equipment, to PCA at 1.888.772.9772 (24 hours).
 - After reporting the incident, complete the Emergency and/or Incident Report Form with all the details of the spill (APPENDIX C) and send it to PCA immediately:
Fax: 604.592.2982
Email: nbopsaint@productcare.org
 - According to the provincial Hazardous Waste Regulations, spills must also be reported to the NB Department of Environment and Local Government (DELG). DELG has a head office located in Fredericton and is supported by six regional offices throughout the Province. During normal

operating hours (Monday to Friday), 8.15 am to 16.30 pm, spills are to be reported to the department regional office closest to the emergency.

Bathurst Region	(506) 547-2092
Miramichi Region	(506) 778-6032
Moncton Region	(506) 856-2374
Saint John Region	(506) 658-2558
Fredericton Region	(506) 444-5149
Grand Falls Region	(506)473-7744

- If contact cannot be made with a DELG regional office, or if the spill occurs after-hours, contact the Canadian Coastal Guard:
Phone: 1-800-565-1633

NOTE: Large spills, chemical reactions or fires should be handled by qualified professionals. Do not attempt to respond to such incidents. Follow the collection site emergency response procedure.



NOTE: If the spill escapes containment and/or reaches waterways, treat it as a large spill.

NOTE: Your local fire department is trained in handling dangerous goods incidents. We strongly suggest developing a response plan with their cooperation.

Replacement supplies can be requested for free from PCA in three ways:

- When you call for pickup
- On your monthly inspection form
- On the incident report form

PCA charges for replacing lost or misused spill kits and/or supplies that are lost or used for non-PCA tasks. Replacement supplies are only free if incident report forms have been provided to indicate appropriate spill kit use.

8 VISITS BY PCA'S REPRESENTATIVE

PCA representatives may visit your location. Please assist the representative by having your records readily available. These visits are also a valuable opportunity to discuss any concerns or questions you may have about the Program. If between visits and you have any concerns or questions, please contact PCA rather than waiting until a PCA rep comes to visit.

APPENDIX A. PAINT REUSE FORM



Send completed form to Product Care via either:

Email: nbopspaint@productcare.org

Fax: 1.604.592.2982

PAINT REUSE LIABILITY RELEASE FORM – PLEASE READ CAREFULLY

TO: Product Care Association

AND TO: _____
Depot Name and Address (Full Mailing Address)

- I confirm that the product (the “Product”) received by me today is offered as part of a free “Paint Reuse”. I also acknowledge that Product Care, the Depot Owner/Operator and all other organizers, sponsors and contractors of the Paint Reuse (collectively the “Sponsors”) make **NO REPRESENTATION OR WARRANTY AS TO THE MERCHANTABILITY, QUALITY, CONTENTS OR ORIGINS OF THE PRODUCT OR TO THE FITNESS OF THE PRODUCT FOR ANY PURPOSE.**
- I accept the Product “*as is*” and I acknowledge that the Product has not been inspected by any of the Sponsors. **I ACCEPT ALL RISKS ASSOCIATED WITH ANY USE OF THE PRODUCT WHATSOEVER.** In consideration for the Product, I release the Sponsors from all claims, damages, losses, causes of action, or actions arising from the receipt and/or use of the Product. I am aware that by signing this release, I am waiving all legal rights against the Sponsors in relation to the acceptance and use of the Product.
- The term “Product Care” as used in this release includes the Product Care’s members, officers, directors, employees, agents and contractors.
- I acknowledge that if I have any reason to suspect that the Product has been altered in any way or that the contents are not represented by the original label information, I should not use the Product and I may return it to

DATE: (Please Print)	NAME: (Please Print)	SIGNATURE: (Confirming Release of Liability)	PHONE NUMBER: (Please Print)	PROJECT THE PAINT WILL BE USED FOR	LATEX (# of containers)		ALKYD (OIL) (# of containers)	
					1 GAL	5 GAL	1 GAL	5 GAL
CONTAINER TOTALS:								

Collection Site Operator’s Name (Please print): _____ Signature: _____ Date: _____

APPENDIX B. MONTHLY INSPECTION FORM



SEND COMPLETED FORM AT MONTH END TO:

Mail: 7781 Vantage Way
Delta, BC V4G 1A6

Number of tubskids (T) and drums (D) on site:			
	Paint	Aerosol	
Full		(T)	(D)
Empty		(T)	(D)

☐ Spill kit complete and ready for use
 ☐ Both signs are clean, in-place, and readable
 ☐ Guidelines are available to staff
 ☐ Collection area is cleaned and organized
 ☐ All current staff have been trained and tested
 ☐ Program rack cards are available
 ☐ Tubskids and lids are in good condition
 ☐ Collection site is locked and secured after hours

Date _____ Telephone #: _____

Updated copies of the forms may be posted on the PCA website www.Productcare.org.

APPENDIX C. EMERGENCY AND/OR INCIDENT REPORT FORM



PRODUCT CARE ASSOCIATION
EMERGENCY and/or INCIDENT REPORT

Collection Site Name:			
Collection Site Location:			
Employee Name:			
Phone Number:			
Date of incident:		Time of incident:	
Instructions:	Check one of the following emergencies and fill out the appropriate information. Attach a separate form if you need more space.		

☐ **SPILL?**

<input type="checkbox"/> Spill in parking lot <input type="checkbox"/> Spill in reception area <input type="checkbox"/> Spill in other area: _____ <input type="checkbox"/> Customer caused spill <input type="checkbox"/> Spill caused chemical reaction Chemicals involved in reaction (if known): _____	Type of surface spilled on: <input type="checkbox"/> Gravel <input type="checkbox"/> Asphalt <input type="checkbox"/> Concrete <input type="checkbox"/> Wood
--	---

☐ **FIRE?**

<input type="checkbox"/> Fire in parking lot <input type="checkbox"/> Fire in reception area <input type="checkbox"/> Fire in aerosol paint tubskids <input type="checkbox"/> Fire in paint tubskids	<input type="checkbox"/> Fire in other area: _____ <input type="checkbox"/> Fire Department called <input type="checkbox"/> Fire extinguishers used (if so, the unit(s) must be serviced)
---	---

☐ **PROPERTY DAMAGE?**

<input type="checkbox"/> PCA Equipment damaged <input type="checkbox"/> Tubskid damaged	<input type="checkbox"/> PCA drum damaged <input type="checkbox"/> Other property damaged: _____
--	--

Describe in detail the incident or accident. This includes exposure to chemicals, smoke, chemical inhalation and bodily injuries, as well as property damage. If a spill occurred, what was spilled, and any other information that is important to this incident:			
Describe your response effort (what did you do?):			
Was staff wearing protective gear? <input type="checkbox"/> Yes <input type="checkbox"/> No		Was anyone hurt? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, attach a copy of the WCB Form and Record to this report.			
What are your suggestions to help prevent this incident from happening in the future?			
Phone and report the incident immediately on the emergency phone line. Please complete the information and email or fax to Product Care. The email, fax, and emergency telephone number are below:			
Email:	OM@productcare.org		
Emergency Telephone:	1.888.772.9772 (24 hours)		
Fax:	604.592.2982		
Employee Name:		Signature:	
Manager Name:		Signature:	

APPENDIX D. NB PAINT COLLECTION SITE GUIDELINES QUIZ

Print your name _____

Date _____

This quiz lets you see how much you have learned by reading the manual. There may be more than one correct answer to each question. **Circle the best answer**, for example b. If you do not know an answer, look it up in the manual. When you finish, give the quiz to the collection site operator to discuss any mistakes you may have made.

1. This program is called the
 - a. Product Care Stewardship Program
 - b. Recycling Program
 - c. Industrial Products Program
 - d. Provincial Waste Collection Program
2. Consumers can help protect our environment by
 - a. Not using products that are harmful to the environment or using less harmful ones
 - b. Reducing the amount of products used and giving leftover products to someone who can use them
 - c. Cleaning-up products spilled outside
 - d. All of these
3. Collection site workers are responsible for
 - a. Taking part in safety instructions
 - b. Using work practices described in the instructions
 - c. Reporting conditions that may be dangerous
 - d. All of these
4. An inspection of the yard, storage room equipment and supplies is required
 - a. Once a week
 - b. Once a month
 - c. Once a year
 - d. Only if there is a fire or spill
5. Which of these products are not accepted by the program?
 - a. Commercial or industrial products
 - b. Leaking or poorly sealed containers
 - c. Products in containers larger than 20 litres
 - d. A & C
6. Hazards to be considered when working with returned products are
 - a. Compressed gas hazards
 - b. Tripping & falling hazards
 - c. Lifting hazards
 - d. All of these
7. When a product is in a glass container
 - a. It must be placed in a tote with absorbent
 - b. It must not be accepted
 - c. It must be sealed in a plastic bag
 - d. It must immediately be placed in a tubskid
8. Aerosol paint cans
 - a. May be dangerous if crushed
 - b. Could be dangerous in a fire
 - c. Must be placed in a drum
 - d. All of these
9. In case of a spill
 - a. You must act quickly to control it
 - b. You must inform the program headquarters
 - c. You must follow spill clean-up procedures
 - d. All of these

When you have finished this quiz, give it to the collection site operator for checking.

(The following section is to be completed by the collection site manager)

SCORE:		DATE:		Manager's Signature
---------------	--	--------------	--	----------------------------

ANSWERS TO QUIZ

This information is provided for the collection site operator to check a completed quiz and discuss any misunderstandings that the worker may have.

1. This program is called the
 - a. **Product Care Stewardship Program**
2. Consumers can help protect our environment by
 - d. **All of these**
3. Collection site workers are responsible for
 - d. **All of these**
4. An inspection of the yard, storage room equipment and supplies is required
 - b. **Once a month**
5. Which of these products are not accepted by the program?
 - d. **A & C**
6. Hazards to be considered when working with returned products are
 - d. **All of these**
7. When a product is in a glass container
 - b. **It must not be accepted**
8. Aerosol paint cans are
 - d. **All of these**
9. In case of a spill
 - d. **All of these**

APPENDIX E. PAINT COLLECTION SITE NOTIFICATION FORM

PAINT COLLECTION SITE NOTIFICATION FORM

Site Name:		Phone Number	
Address:		Contact name:	

Please complete the below information depending on your change:

COLLECTION SITE NAME CHANGE	
Previous collection site name:	
New collection site name:	
Is this a legal name change? <input type="checkbox"/> YES <input type="checkbox"/> NO	
Effective date of name change:	
<i>Please note that a legal name change requires a new contract.</i>	
COLLECTION SITE OWNERSHIP CHANGE	
Previous collection site ownership:	
New collection site ownership:	
Effective date of ownership change:	
<i>Please note that an ownership change requires a new contract.</i>	
COLLECTION SITE LOCATION CHANGE	
Previous collection site location:	
Reason for location change (please provide details):	
New collection site location (this is important as PCA must notify the Ministry of the Environment):	
Phone number:	Contact name:
Effective date of location change:	
COLLECTION SITE CLOSURE	
Reason for closure: <input type="checkbox"/> Financial <input type="checkbox"/> Lack of resources <input type="checkbox"/> Selling business <input type="checkbox"/> Lack of time <input type="checkbox"/> Other:	NOTES: <div style="border: 1px solid black; height: 100px; margin-top: 5px;"></div>

QUESTIONS	
What comments do you have on the PCA program(s)?	
What can be improved with the program(s) in the future?	
Would you participate in the PCA program(s) again?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Other Comments:	

By signing this form, I verify that no unreported spills have occurred at this site:

_____	_____	_____
<signature>	<print name>	<date>

Please send the completed form to:

Email: nbpaintrecycle@productcare.org
Fax: 604.592.2982
Mail: 7781 Vantage Way
 Delta, BC V4G 1A6

APPENDIX F. NON-PROGRAM PAINT IDENTIFICATION



Roof tar, or repair

- Black in colour
- Often in caulking tubes



Roof tar, or repair

- Black in colour
- Often in caulking tubes



Roof membrane primer or adhesive

- Not a coating, but a preparation for repair
- Often an adhesive



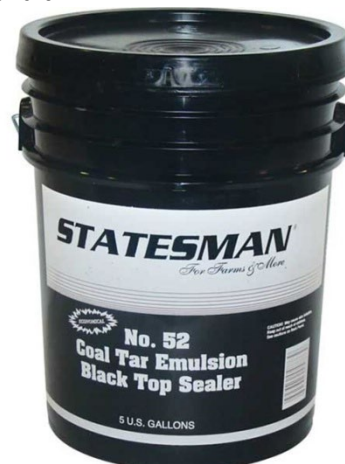
Bitumen-based driveway sealer

- Black in colour
- Look for wording: coal tar, black-top, asphalt



Bitumen-based foundation coating

- Black in colour



Bitumen-based sealer

- Black in colour

- Look for wording: coal tar, black-top, asphalt



Automotive paint

- Non-aerosol
- May have car names (ex. Chevrolet orange)



Caulking tubes

- Anything in a caulking tube is NOT a coating

- Look for wording: coal tar, black-top, asphalt



Automotive thinner and spray gun cleaner

- Flammable liquid (NOT accepted as Paint)
- Also known as gun wash



Cement

- Cement of any kind (mortar based or flammable)
- Trowel application or requirement to pre-mix is a good indicator



Cleaners

- Not a coating



Dryfall paint

- Meant for spray gun applications
- Painting ceilings or high areas without paint splatter



Cement colorants & tints

- Not coatings
- Additives of any type are not accepted



Wax and polishes

- Not a coating



Cement/concrete additives

- Not coatings
- Additives of any type are not accepted



Colorants & tints

- Not coatings
- Additives of any type are not accepted



Adhesive

- Not a coating



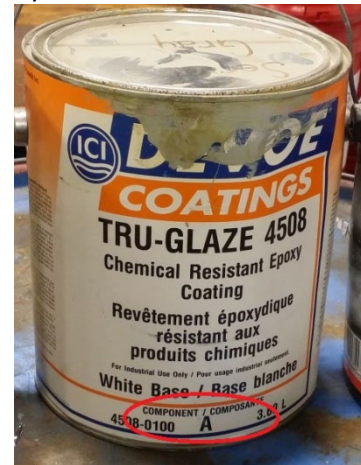
2 part floor coatings

- Industrial paint and epoxy adhesives often require 2 parts, activator, curing agent, or a catalyst.



2 part floor coatings

- Industrial paint and epoxy adhesives often require 2 parts, or a catalyst



2 part coatings

- Industrial paint and epoxy adhesives often require 2 parts, or a catalyst



Craft Paint

- Not architectural
- Non-aerosol
- Small containers or squeeze bottles



Fabric paint

- Not architectural
- Similar to craft paint.



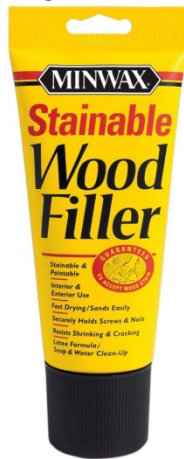
Drywall compound, drywall mud

- Trowel on solid
- Not a coating



Spackle

- Trowel on solid
- Not a coating



Wood filler

- Not a coating
- Spread on paste



Wood putty

- Not a coating
- Trowel on paste



Floor patch/floor leveller

- Trowel on solid
- Not a coating



Stucco patch

- Pre-mixed acrylic mortar
- Not a paint



Autobody Filler

- Automotive use
- Filler & not a coating



Fibreglass patch or repair

- Not a coating
- Often 2 part



Fibreglass resin/fibreglass patch or repair

- Not a coating
- 2 part (requires a catalyst)



Antifouling paint

- Toxic marine paint
- Registered as a pesticide (PCP #)



Paint not in original containers

- Glass jars, household plastic containers
- Cannot be identified, no original label



Unlabelled cans

- Cannot be identified
- No original label



Label is illegible

- Can has original label, but the information is obscured or faded.
- Cannot properly identify material



Label is mostly missing

- Can has original label, but key information is missing
- Cannot properly identify or sort material



Traffic paint

- Industrial material (not accepted)
- Used by road crews or warehouses to mark pathways



Line marking paint

- Industrial material (not accepted)
- Used by road crews or warehouses to mark pathways

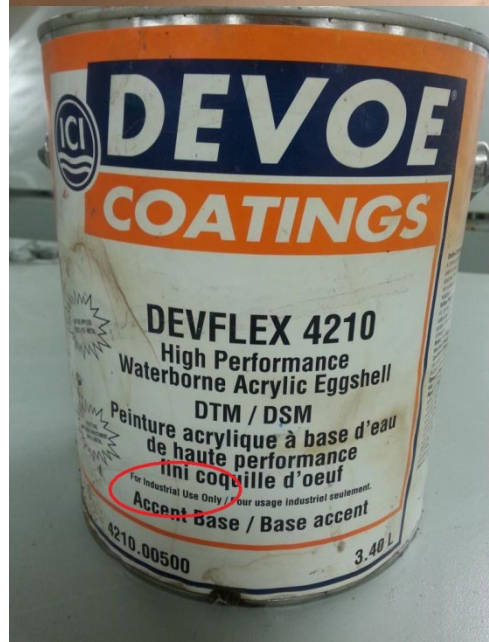
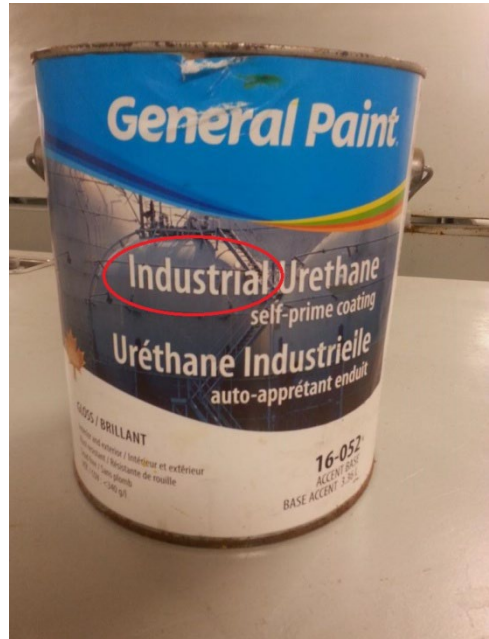
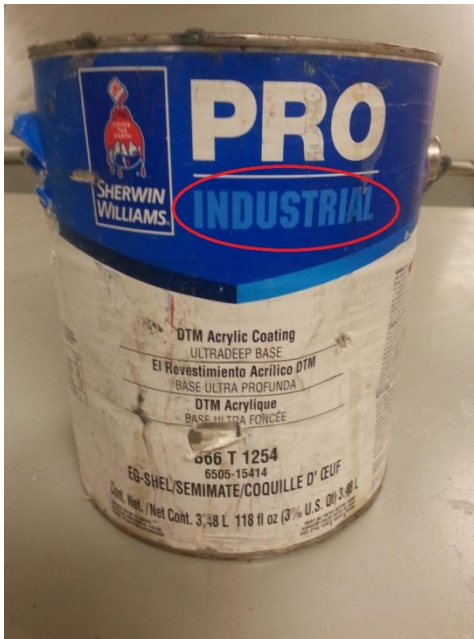


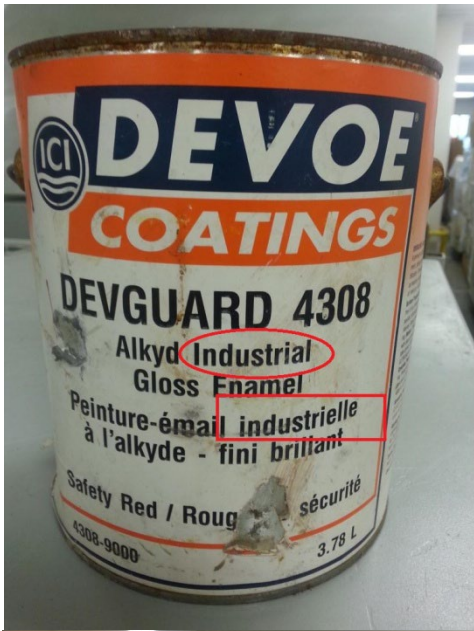


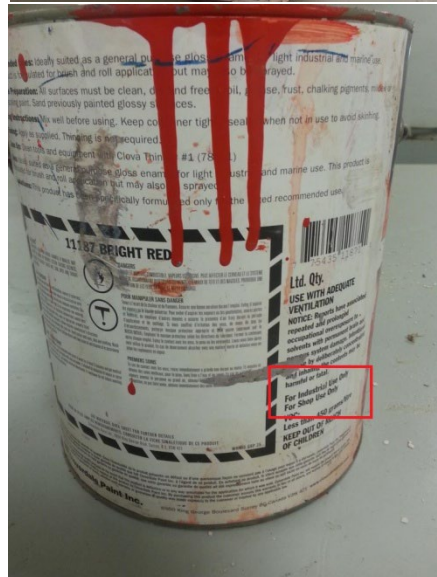
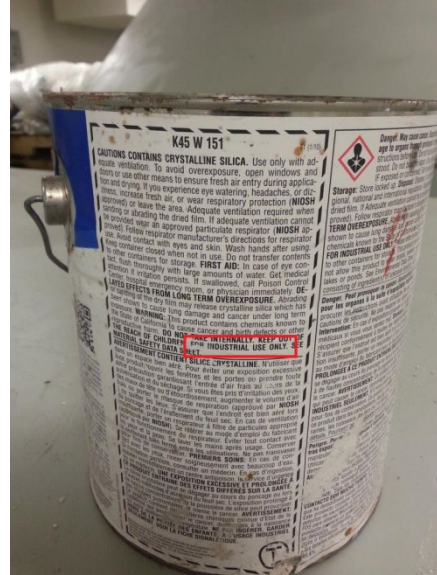
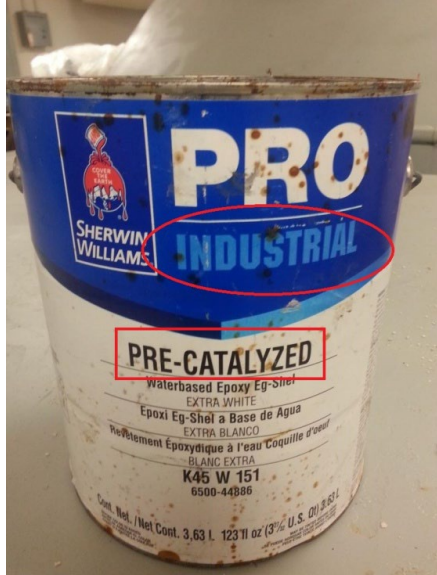
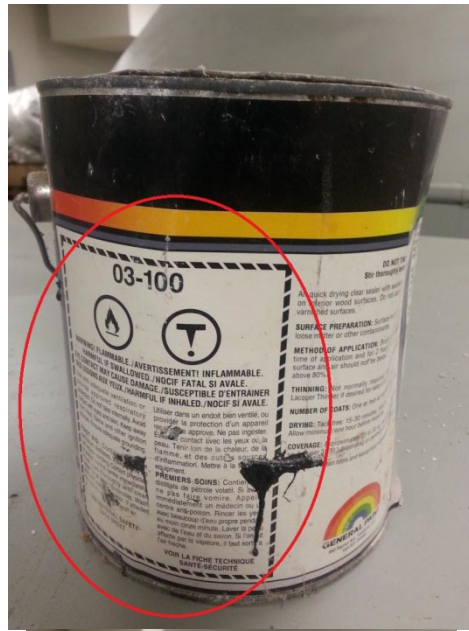
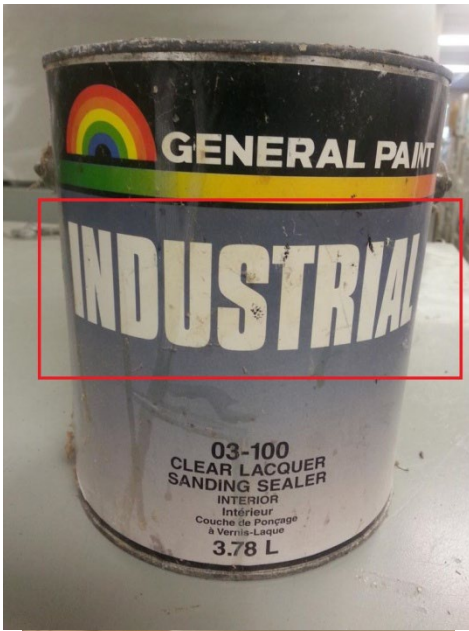
Industrial Paint

- Look for the word “industrial” or “for industrial use”
- Other wording: pre-catalyzed, two component, Component A or B
- May be a “fast dry” or “speed dry” paint
- WHMIS/GHS labelling or TDG label a good indicator (still must say “industrial” on container)











Industrial Paint

- Look for the word “industrial” or “for industrial use”
- Other wording: pre-catalyzed, two component, Component A or B
- May be a “fast dry” or “speed dry” paint
- WHMIS/GHS labelling or TDG label a good indicator (still must say “industrial” on container)

APPENDIX G. PAINT ACCEPTANCE FLOW CHART

PAINT ACCEPTANCE FLOW CHART

