

Product Care

EPR for HHW

CRRA – Los Angeles, August 5, 2015

Mark Kurschner, President, Product Care Association



ReGeneration
Special waste recycling by Product Care
www.regeneration.ca

About Product Care



- Product Care Association (PCA) has managed special waste recycling programs in Canada since 1994.
- Formed in 1994 in response to Product Stewardship Regulations in BC as a Federal, not-for-profit organization
- Provides compliance for industry members whose products are designated under provincial Extended Producer Responsibility (EPR) laws
- Industry-based board of directors divided into product sectors
- PCA rebranded its suite of programs “ReGeneration” in 2014

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Programs









- Operates stewardship programs in 9 provinces in Canada
- Operates LightRecycle program in Washington State in cooperation with NEMA
- Worked with PaintCare to implement the first paint stewardship program in USA (Oregon), followed by California
- Working with Mattress Recycling Council programs in Connecticut, California and Rhode Island



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PCA programs



-  **Paint:** BC, Sask., Manitoba, New Brunswick, Nova Scotia, Newfoundland, PEI, Ontario
-  **Flammable liquids** (including solvents), **pesticides** and **other HHW products:** BC, Manitoba, Ontario (pending)
-  **Lighting:** BC, MB, QC, PEI, ON, in USA: WA,
-  **Smoke and CO Alarms:** BC
-  **Small Appliances:** BC (contracted by CESA)
-  **Major Appliances:** BC (contracted by MARR/AHAM)
-  **Outdoor Power Equipment:** BC (contracted by OPEIC/OPEI)


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PCA programs

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MANAGING MULTIPLE PROGRAMS



Advantages	Challenges
<ul style="list-style-type: none"> • Higher profile and critical mass • Common administration • Member audits • Communication materials 	<ul style="list-style-type: none"> • Varying regulatory structure • Multiple regulators • Harmonization of product definitions • Variations in targeted generator (consumer v commercial)

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Product Care - Summary of Programs

	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
PCA programs															
BC Paint Plus	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
BC LightRecycle															
BC AlarmRecycle															
SK Paint															
MB HHW and Lights															
CN Paint															
CN Lights															
QC Lights															
NB Paint															
NB Paint															
NL Paint															
PEI Paint															
PEI Lights															
WA Lights (PCA-USA)															
PCA programs total	2	2	3	3	4	5	6	10	10	10	14				
Client Programs															
SWEEP															
CN MRSW															
AB paint															
PaintCare															
BC small appliances															
BC Outdoor power equipment															
BC Major Appliances															
MB E-waste (online registration/recruitment/revenue and expense management)															
QC E-waste (online registration only)															
BC Toys (revenue management only)															
CT Mattresses															
Client Programs Total	1	3	3	4	3	7	8	5	4						
Total	2	2	3	4	6	7	9	9	17	10	15	18			
Net Change from Prior Year	0	0	1	2	1	2	0	8	1	-3	3				

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Rebranding as "ReGeneration" for consumers

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Corporate Name

- Remains as the legal name that appears on all contracts and agreements

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Consumer-Facing Brand

- More intuitive and engaging to consumers
- Umbrella brand under which all programs are represented (PaintRecycle, LightRecycle, AlarmRecycle etc.)

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EPR Programs in Canada

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Major EPR product categories in Canada

- Packaging and Printed Paper (PPP or "blue box")
- Beverage Containers – often deposit return
- Automotive: motor oil, tires, car batteries
- Electronics – computer, monitors, printers
- Appliances – large and small
- Batteries – single use and rechargeable
- Paint
- Household hazardous waste (HHW)
- Lights and fixtures
- Pharmaceuticals
- Outdoor power equipment
- Smoke Alarms

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National EPR Action Plan (Canada)*

Phase 1 (by 2015)

- Automotive products
- Electronics and electrical products
- Household hazardous and special wastes
- Mercury containing lamps
- Packaging
- Printed materials
- Other mercury-containing products

Phase 2 (by 2018)

- Construction materials
- Demolition materials
- Furniture
- Textiles and carpet
- Appliances, including ozone-depleting substances (ODS)

*Canadian Council of Ministers of the Environment

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PCA Program Products

Note: All products have container size restrictions and not all products are accepted in all programs.

Paint Products
All household architectural paint products including aerosols.

Flammable Liquids and Waste Gasoline
Products that display the flammable symbol and is a liquid or aerosol.
Gasoline accepted only in an approved gas can or jerry can.

Physically Hazardous
Non-refillable gas cylinders that display both the flammable symbol and explosive symbol.

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ACCEPTED PRODUCTS

Pesticides
Consumer pesticides that have the poison (skull & cross bones) symbol, the Pest Control Product (PCP) number and the word "Domestic" on the label.

Toxics
Products that display the poison symbol, says "Danger" and is a liquid or aerosol.

Corrosives
Products that display the corrosive symbol, liquid, aerosol or solid.

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HHW list from CCME*

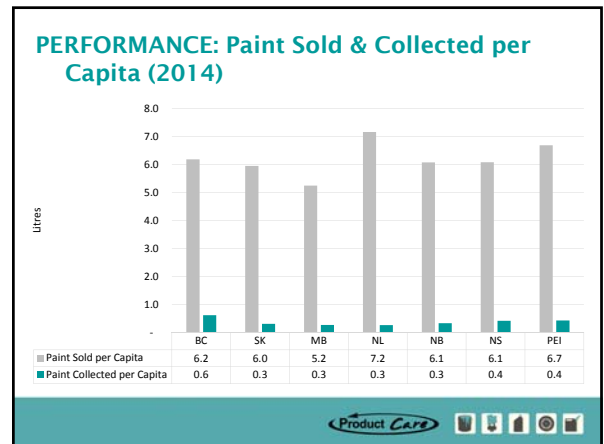
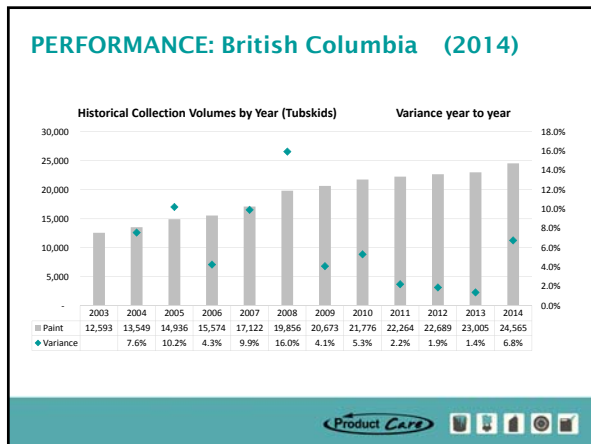
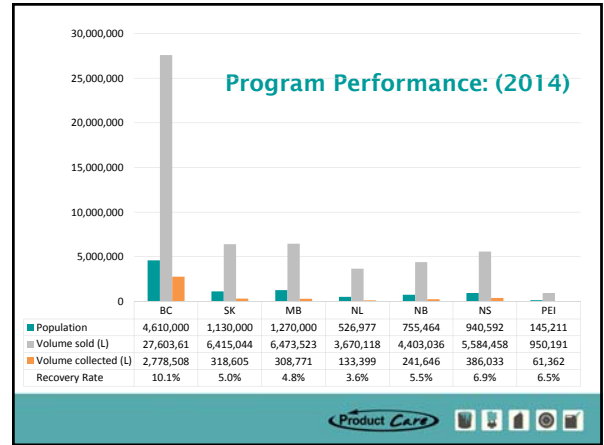
- paints and coatings and their containers
- solvents, such as thinners for paint, lacquer and contact cement, paint strippers and degreasers, and their containers
- all batteries, including single-use, but excluding lead acid batteries
- pressurized containers, such as propane tanks and cylinders
- fertilizers and their containers
- pesticides, fungicides, herbicides, insecticides and their containers
- aerosol containers, such as hair-spray containers
- portable fire extinguishers
- pharmaceuticals and sharps, including syringes
- corrosive materials
- environmentally hazardous materials
- flammable materials
- explosives (but not including ammunition)
- toxic materials.

*Canadian Council of Ministers of the Environment

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Program performance and outreach

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COMMUNICATIONS: POS Materials

BC Paint Point-of-Sale Brochure: Side 1

information:

- FAQs
- About Product Care
- Eco-fees

COMMUNICATIONS: POS Materials

BC Paint Point-of-Sale Brochure: Side 2

- Accepted and not accepted products

COMMUNICATIONS: Consumer Awareness Levels

Awareness surveys on paint recycling programs completed between 2013 and 2015:

- British Columbia: 66%
- Saskatchewan: 81%
- Manitoba: 36%
- Newfoundland & Labrador: 32%
- New Brunswick: 38%

Program Challenges

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HHW Program Challenges

- Tempering consumer expectation that the program should take everything
- Consumable products, typically no expiry date
- Low volumes as compared to other stewarded products
- Difficult to measure success or set targets
- Defining products to be easily understood by consumers, retailer and industry (technical vs SKU vs product labelling)

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Regulatory disharmony

	Mercury Lamps: Residential-Use	Mercury Lamps: ICI-use	Other lamps: Residential and ICI	Fixtures and Ballasts
BC	✓	✓	✓	✓
PEI	✓	✓	✓	
QC	✓	✓		
MB	✓			

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FINANCIAL AND NON-FINANCIAL AUDITS




- More stringent requirements for third-party verification
- “Reasonable level of assurance”
- Not a usual process for audits firms
- Member audits are resource intensive
- Environmental audits

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HHW Program Challenges (cont’d)

- Collection sites subject to Hazardous Waste Regulation
- Transportation subject to Hazardous Waste Regulation and Transportation of Dangerous Goods Regulation
- Zoning
- Fire code
- Worker Safety requirements
- Limited collection infrastructure
- Limited potential service providers for collection/transport/processing
- Collection events faster to set up but typically much higher costs vs permanent depots and less convenient

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Program Challenges (cont’d)

- Consumer products vs. commercial products
- Industry self organization vs. gov’t agency
- Single program vs. multiple programs
- Location of service providers
- Historic waste and non-member waste
- Targets and penalties
- Recyclability of special waste products






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Program Overview



- Mercury-containing Lights Proper Disposal Law (Chapter 70.275 RCW).
- Covers individuals and businesses in Washington State.
- Recycle up to 10 mercury-containing lights per person per day at no charge.
- Program products are mercury-containing lights, including:
 - Fluorescent Tubes up to 8 feet in length, straight and curved
 - Compact Fluorescent Lamps (CFL) – All sizes and types
 - High Intensity Discharge (HID) – HID lights include High Pressure Sodium, Mercury Vapor and Metal Halide
 - Any light that contains mercury and provides “functional illumination”.

LightRecycle.org

WA law highlights



- All Producers of mercury-containing lights must participate in an approved product stewardship program.
- Product wholesalers, retailers, distributors, and electric utilities may only distribute or sell mercury-containing lights in or into the state from participating producers.
- Environmental Handling Charge (EHC) must be added to the purchase price of all mercury-containing lights sold at retail in or into Washington State.
- Program must provide no cost collection services in in every county and in addition in every city with populations >10,000 on an ongoing, year-round basis.
- Stewardship organization must pay to regulator \$5,000 per producer.


LightRecycle.org



Program Funding

- As of January 1, 2015, EHC must be added to purchase price of every mercury-containing light sold at retail in or into WA.
- EHC is \$0.25 / light on all types of mercury-containing lights
- Funding is used for:
 - transportation and recycling
 - education and outreach
 - program administration

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Program Revenue

- EHC can be remitted by producer, distributor or retailer
- The distributor or retailer may choose to remit on behalf of the producer. In this case, a remitter relationship is established through a binding "remitter agreement".
- Remitting retailers are entitled to keep a portion of the EHC.
- EHC on sales reported and remitted monthly
- Online reporting system


LightRecycle.org



Program Registration

- Producers, and remitting distributors and retailers must register with LightRecycle WA as participants.
- Currently 144 registered participants, including:
 - 35 Producers
 - 18 Distributors
 - 91 Retailers

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Collection Network

- Government Facilities - MRW/HHW and Transfer Stations
- Retail - hardware, lighting, pharmacy, other
- 315 Collection sites registered (219 all products, 69 CFL only, 27 unadvertised)
- Approximately 73,000 lbs collected in Q1 2015

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Transportation and Processing

Transportation


- Total Reclaim is the approved transporter
- Method depends on volume and location
 - Larger volumes travel by truck (LTL)
 - Smaller and remote locations travel FedEx
- Supplies are delivered on same basis

Processing

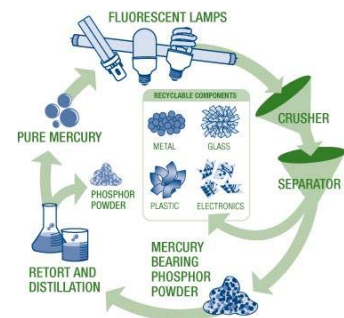
- EcoLights is the approved processor
- High-volume facility in Seattle



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Fluorescent Lamp Processing



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Communications 

Three Audience Groups


- Retailers
- Collection Sites
- Consumers




Agribop Auburn Ace Hardware
Store Manager
308 W Main St
Auburn WA 98001-4909
888-444-4444



IMPORTANT LAW AFFECTING RETAILERS OF MERCURY-CONTAINING LIGHTS

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Communications 

Collection Site Locations

- Posters
- Banners
- Information Cards


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Collection Site Posters & Banners 




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Website



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THANK YOU!

For more information, contact:

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We are all part of the ReGeneration. 

