

March 25, 2021

BC Smoke and CO Alarm Program Plan Feedback

To Whom It May Concern:

Thank you for the opportunity to comment on the draft plan. Zero Waste BC is a non-profit association dedicated to driving systemic change towards Zero Waste in BC. Zero Waste is the conservation of all resources by means of responsible production, consumption, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health. Our current resource consumption systems of linear-take-make-waste not only create waste but also generate a huge amount of greenhouse gases which constitute some of the discharges that threaten the environment and human health. EPR programs can play a key role in changing these systems.

We are pleased that BC has regulated these products and that this EPR program exists. The program has evolved a lot and set up many strong elements since it first began which is to be commended. However, as the program plan goes for its next renewal, we submit these comments in hope that the program will not just *meet requirements* but really show leadership in the realm of EPR to move it beyond mere recycling to actually changing the nature of the products and how the service is delivered, as envisioned in the Canadian Council of Ministers of Environment Canada-wide Action Plan for EPR.

Please see our comments by section below:

- 5. Stakeholder Consultation -Product Care is to be commended for conducting a study on fair compensation however sometimes these studies look solely at the actual time spent managing products coming in and fail to include the need for a business to be open regular business hours in order for customers to come and return product. While it would be nice to just open a store for three hours a week and condense all the business in to the necessary time frame, retail does not work like that and neither should collection depots. As such, compensation needs to be adequate to make these businesses viable. That often requires collecting for multiple programs but in smaller communities, may require a higher rate of pay than for those where the volumes of all products are higher. Consideration should also be given to the costs of acquiring space as well as offering a suite of options within one community if it helps to build collection hubs for multiple lines of recycling.
- 6.2 Collection System -Programs should provide service in all municipalities and if no service provider can be contracted, the program itself should set up the collection

depot. We commend the program for the proposed actions to engage contractors in the commercial sector.

- 6.3 Accessibility -the SABC standard has not been developed in consultation with local governments nor the public nor does it meet the intent of the Recycling Regulation. It is good that the program will work with the BC Product Stewardship Council to determine the underserved communities and that none exist to date. We also commend the program for its proactive work with IZW TAG and FNESS and hope the program will continue to look for these opportunities.
- 6.4 Collections. The plan notes the build-up of dust in the alarms as a reason to replace them but research should be conducted to see if the lifespan of the alarms could be extended through cleaning or other maintenance. Also, if it is only certain components of the alarm that create the requirement to replace them, research should be conducted into the ability to replace only those parts to make it similar to changing out a battery. The plan notes the difficulty in knowing the amount of product available to collect each year so this indicates that the program should be looking at other ways to gather this data such as more frequent waste composition audits and consumer surveys on product replacement and disposal (note that surveys could also be an educational tool to ensure consumers have well-functioning alarms).
For the capture rate, as noted, other ways to gather this data should be pursued. There needs to be some measure of effectiveness of the program beyond units collected, in particular to understand how many units were *not* collected.
- 6.5 End of Life Management -Waste composition studies should be more frequent and cover a wider range of regional districts.
- 6.6 Performance Metrics -in addition to reporting units and batteries collected, the reporting should note the initiatives developed to try to redesign products to have a lower environmental footprint, the estimate of the number not collected, data from the waste composition studies, and changes in the results of ongoing surveys for how many people disposed of the alarms and where they put them. As noted before, the SABC standard and a target based on that is not suitable. Instead it should be the number of municipalities and First Nations communities reporting no service in response to an annual survey. It is good that the program will provide transparent data on the results of waste composition studies.
- 7 Consumer Awareness -this goal is very low considering the program started in 2012 and that there is limited data on the effectiveness of the program. Aside from Large Volume Generators, it can be assumed that without public awareness, an alarm ready for disposal will be thrown out rather than recycled. If the program means to be effective and has limited other data, the goal should be to get 95% of the population aware by 2024 (and later 100%). To do otherwise is to continue to externalize costs to the public and the environment. The program could also pursue disposal bans with local governments as a way to ensure consumers do the right thing but also that they are aware that throwing the alarms away is not appropriate.

- 8. Management of Program Costs -while no program wants to charge more than is needed to run the program, the stated goal of ensuring that the fees are no more than necessary while having a low target for awareness and not being certain of the program effectiveness speaks to the issue of having an all-industry member board and puts further pressure on the Ministry to set for higher targets for programs. The program should be developed to meet all the intentions of the Recycling Regulation (including Design for Environment, reducing materials required, reducing the environmental footprint, looking at ways to repair or reuse parts, etc) and then determine what level of fees is necessary to achieve that.
- 9. Management of Environmental Impacts -further aspects to look at could be minimizing of packaging (not just ensuring it is recyclable) and perhaps having reusable packaging that gets returned with the old unit (another way to drive collection and awareness). What conversations are happening between the program and product designers to encourage replacement of parts rather than whole units, reuse and repair, creation of differential fees based on environmental impacts, the use of recycled content from old alarms (true recycling)? What is the program doing to encourage adoption of RoHS standards here and to strengthen them? The program should report on industry initiatives but also should be a key part in driving them. Managing materials in accordance with the regulations is required but the program should be looking for avenues to move more materials up the Zero Waste Hierarchy.
- Table 2 -no details are provided on the types of plastics used and if they are uniform and what the end fate is for these plastics. To what degree are they being recycled? This information should be included. The same goes for metals. What is the process for taking these apart and does it create a system where 100% of the metal gets collected and sorted and the same for plastics or is there a component of contamination and loss? Is any of the plastic being burned or used for fuel? These are good targets but they should be in addition to targets for reduction of materials used (total and also for harmful materials), and reduction of the components that need to be replaced. Perhaps there is a way to test if the alarm is still working that does not require an automatic replacement and so consumers could be encouraged to do that instead.
- 11. Performance Measurement -the program could go beyond what is the minimum required and provide third party audits for certain ones of the other components.

We hope that this information is helpful in crafting the renewed plan.

Sincerely,
Sue Maxwell
On behalf of Zero Waste BC