



May 27, 2026

Ministry of Environment & Parks
Province of British Columbia

Subject: Request to exclude refillable propane cylinders from EPR requirements under B.C.'s Recycling Regulation

To Whom It May Concern:

I am writing on behalf of the Canadian Propane Association (CPA) regarding the Ministry's phased expansion of extended producer responsibility (EPR) as described in the [Extended Producer Responsibility Five-Year Action Plan 2021–2026](#) and implemented through B.C.'s [Recycling Regulation](#) (B.C. Reg. 449/2004).

Specifically, the CPA requests that **refillable propane cylinders up to 100 lb** be **excluded** from any new or expanded EPR requirements, because the propane cylinder system in B.C. already operates as a highly effective circular economy with near-complete recovery, reuse/requalification, and end-of-life metal recycling.

1. Propane cylinders already meet (and exceed) the policy objectives of EPR

In B.C., refillable propane cylinders are routinely recovered through established exchange and refill channels, inspected and requalified for continued use where appropriate, and ultimately recycled as scrap metal when they can no longer be safely requalified.

Under Transport Canada requirements and the applicable CSA standards, cylinder requalification must be performed by registered facilities using approved procedures, and personnel conducting visual inspection or pressure testing must be appropriately trained and competent for those functions. Transport Canada also maintains a registry of authorized requalifiers and issues certificates and identifying marks to registered facilities, reinforcing that this is already a controlled, specialized compliance system rather than a general waste stream.

Because a refillable cylinder's service life frequently reaches 30–40 years, recycling and recovery data can be misinterpreted if compared directly to annual produced sales (i.e., today's sales will not appear as returns for decades). In practice, this results in recovery rates that are materially higher than the recovery benchmarks commonly referenced for EPR programs.

The Ministry's Recycling Regulation Guide explains that compliance for regulated products is typically demonstrated through an approved EPR plan, an annual report, and a formal plan review every five years. For refillable propane cylinders, those administrative mechanisms would largely duplicate a

system that is already operating effectively, without improving or even, potentially, negatively impacting environmental outcomes.

2. Difficulties and unintended consequences of including refillable propane cylinders in EPR:

- **Higher risk of premature scrapping and lost reuse:** If cylinders are managed by service providers without propane-cylinder inspection/requalification expertise, viable cylinders may be scrapped simply because they are out of date rather than requalified, increasing greenhouse gas emissions and demand for new steel and components.
- **Safety and competency concerns:** Propane cylinders are regulated pressure vessels and require specialized handling, inspection, and transportation practices. Introducing new actors primarily oriented to scrap/recycling can increase operational and safety risk.
- **Duplicative administrative burden with limited environmental benefit:** For an already high-performing circular system, the incremental requirements to register as a producer, develop and maintain an EPR plan, and complete annual reporting and five-year plan reviews would not materially improve outcomes.
- **Increased consumer costs:** The Guide notes that EPR programs are commonly funded through consumer-facing fees (eco fees / environmental handling fees). Applying a new fee layer to a system that already pays for recovery and recycling would increase costs with no commensurate benefit.
- **Risk of reduced efficiency:** Additional requirements for advertising, formal dispute resolution, and prescribed collection/communication measures can add overhead to a market that already provides widespread access through exchange, retail, and refill networks.

3. Process and clarity concerns

In previous materials provided to stakeholders, the CPA did not see clear indication that *refillable* propane cylinders would be included in the planned expansion. We understand the Ministry has discussed inclusion during stakeholder webinars; however, given the distinct safety and circular-economy characteristics of refillable cylinders, the CPA requests additional clarity on scope and an opportunity to review the rationale for regulating an already high-performing system.

4. Proposed path forward

To avoid unintended environmental and safety outcomes while still supporting the Ministry's waste-prevention objectives, the CPA recommends one of the following approaches:

1. **Exclude refillable propane cylinders up to 100 lb** from the regulated product category and focus EPR requirements on products that lack effective collection/reuse systems.
2. **Use a tailored "orphan cylinder" model (as used in other jurisdictions)** that recognizes the existing propane cylinder circular economy and targets only the limited problem that persists outside normal exchange/refill channels. For example, Ontario's producer responsibility



framework for hazardous and special products establishes a *call-in collection service* approach for refillable propane containers, focusing producer obligations on responding when cylinders are orphaned rather than recreating a full new parallel collection system.

3. Co-develop technical guidance with industry to ensure any regulatory approach does not incent premature scrapping, and ensures that any service providers handling cylinders demonstrate appropriate propane-cylinder competency.

The CPA would welcome a meeting with Ministry staff to walk through the existing propane cylinder circular economy, the safety considerations specific to pressure vessels, and options to ensure B.C.'s approach remains outcome-focused and evidence-based.

Thank you for your consideration.

Sincerely,



Katie Kachur
Vice President, Government Relations, West
Canadian Propane Association

CC: Clint Hillman, BC Committee Chair

CC: Curtis Robinson, BC Committee Vice Chair

CC: Robert Loenhardt, CPA Senior Vice President, Regulatory & Health & Safety

