



Reference: 33043

November 6, 2018

Craig Wisehart  
Executive Director  
Electronic Products Recycling Association  
100 – 4259 Canada Way  
Burnaby BC V5G 4Y2

Dear Craig Wisehart:

Thank you for submitting proposed amendments to the EPRA (Electronic Products Recycling Association) BC Product Stewardship Plan (the “amendments”) in fulfillment of the requirements of section 6 of the [Recycling Regulation](#) (the “regulation”) made under the *Environmental Management Act*. I appreciate the industry’s continued commitment to achieving compliance in this regard.

Under the regulation, the director has the ability to both amend an approved extended producer responsibility plan (the “plan”) on his own initiative, and to approve amendments to an approved plan that have been proposed by a producer. I have completed my review of, and approve, the amendments proposed by the EPRA on September 7, 2018.

EPRA was provided with my draft decision letter dated August 7, 2018 and the opportunity to propose further amendments or provide additional information for consideration. EPRA addressed several of the identified deficiencies, however one remains outstanding. Therefore, in addition to the amendments proposed by EPRA, and approved by me in this letter, I am further amending the plan, pursuant to section 5(5) of the regulation.

By December 31, 2019, EPRA will:

- Complete satisfactory consultation with stakeholders to meet the requirements set out in sections 5(1)(c)(i) and (vi), taking into consideration guidance provided in the [Recycling Regulation Guide 2012](#) and [Producers Paying the Cost of Managing Obligated Materials and Dispute Resolution 2018](#);
- Submit to the director a stakeholder consultation summary document; and

- Propose amendments to the plan that address regulatory requirements and outcomes of the consultations.

The above additional amendments form part of EPRA's plan and take effect on November 6, 2018.

The requirement to undertake additional stakeholder consultation is common among other plans and plan amendments. Acknowledging the time and effort required on the part of stakeholders to provide meaningful input and feedback, EPRA is encouraged to coordinate with other EPR programs when engaging stakeholders. Proposed amendments to the EPRA plan will be in the form of a revised plan submitted to the director, including the stakeholder consultation summary document. EPRA will also provide the director with a document that clearly highlights all proposed revisions to the plan.

These additional amendments are required to ensure the plan adequately provides for the elements set out in subsections 5(1)(b), (c)(i) and (vi) of the regulation. Specifically, I must be satisfied of the following:

- The producer has undertaken satisfactory consultation with stakeholders prior to submitting the plan for approval and will provide opportunity for stakeholder input in the implementation and operation of the extended producer responsibility program;
- The plan adequately provides for the producer collecting and paying the costs of collecting and managing products within the product category covered by the plan, whether the products are currently or previously used in a commercial enterprise, sold, offered for sale or distributed in British Columbia; and
- The plan adequately provides for a dispute resolution procedure for disputes that arise between a producer and person providing services related to the collection and management of the product during implementation of the plan or operation of the extended producer responsibility program.

Pursuant to section 6 of the regulation and based on the plan's original approval date of December 18, 2006, EPRA's next plan review must be completed by December 18, 2021. However, a director under the *Environmental Management Act* may amend the approved plan pursuant to section 5(5) of the regulation or rescind approval of the approved plan pursuant to section 6.1 of the regulation, should EPRA fail to meet the commitments set out in the approved plan. Please also note that failure to comply with an approved plan may result in the imposition of an administrative monetary penalty of up to \$40,000 or a fine of up to \$200,000.

### **Future plans and amendments**

The ministry expects continuous improvement across all future plans and amendments including the following areas of concern:

1. Plan commitments – for example, use specific and measurable language;
2. Consumer access – for example, develop comprehensive province-wide accessibility – particularly in rural areas, or improve upon the current Stewardship Agencies of B.C. accessibility standard;

3. Consumer awareness - for example, include performance requirements tailored for different consumer groups and all product types managed by the program;
4. Financial transparency – for example, provide greater levels of disclosure in financial statements to better serve interests of producers, the ministry, and other stakeholders; and
5. Pollution prevention hierarchy – for example, highlight program areas of influence.

I acknowledge that some plans better address various concerns than others, and that collaboration between some producers/appointed agencies and the ministry is underway. As well, the ministry intends to develop further guidance on select areas of concern.

### **Third Party Assurance for Non-Financial Information in Annual Reports**

Third party assurance for non-financial information in Annual Reports is required through Section 8(2)(h) of the regulation. The assurance report should be completed in accordance with the document entitled, “Third Party Assurance Requirements for Non-Financial Information in Annual Reports” dated October 2018 and revised from time to time, which is enclosed.

Finally, the ministry expects this approval letter to be forwarded to EPRA’s board of directors as well as its member producers, since each producer is responsible for ensuring its agent fulfills the plan, and compliance proceedings may be taken against a producer if the agent fails to implement the plan.

I look forward to working with you to ensure the success of your program. If you have any questions about this letter, please contact me at 778 698-4860 or [ExtendedProducerResponsibility@gov.bc.ca](mailto:ExtendedProducerResponsibility@gov.bc.ca). If you have any questions regarding the implementation of your plan, please contact your ministry file lead.

Sincerely,



Bob McDonald  
Director, Extended Producer Responsibility Section  
Environmental Standards Branch

Enclosure (2)

cc: Kris Ord, Executive Director, Environmental Standards Branch  
Kristi MacMillan, Ministry file lead, Extended Producer Responsibility Section



# EPRA BC Product Stewardship Plan

Submitted to: BC Ministry of Environment and Climate Change Strategy,  
Extended Producer Responsibility Section  
PO Box 9341, Stn Prov Govt  
Victoria, BC V8W 9M1

Prepared by: Electronic Products Recycling Association  
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Revised December 2017  
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## Glossary of Terms and Abbreviations

C2R	Call to Recycle
CWTA	Canadian Wireless and Telecommunications Association
CWMA	Coast Waste Management Association
DfE	Design for Environment
EHF	Environmental Handling Fee
EOLE	End of Life Electronics
EPR	Extended Producer Responsibility
EPRA	Electronic Products Recycling Association
EPSC	Electronics Product Stewardship Canada
ERRP	Electronics Reuse and Refurbishing Program
ERS	Electronics Recycling Standard
ICI	Industrial, Commercial & Institutional
LAC	Local Advisory Committee
NGO	Non-Government Organization
RCBC	Recycling Council of British Columbia
RCC	Retail Council of Canada
SABC	Stewardship Agencies of B.C

## 1. Introduction

Electronic Products Recycling Association (EPRA) is pleased to submit our renewal plan for our Extended Producer Responsibility Program to the British Columbia Ministry of Environment, pursuant to the requirements of the BC Recycling Regulation (“Regulation”) under the *Environmental Management Act* which sets out the requirements for extended producer responsibility, including the requirement for Extended Producer Responsibility plans. The Program Plan replaces the EPRA BC 2012 - 2016 Product Stewardship Plan approved by the Ministry on April 23, 2012.

## 2. Duty of Producer

Section 2(1) of the Recycling Regulation requires a producer to have an approved plan under Part 2 [Extended Producer Responsibility Plans] and comply with the approved plan with respect to a product in order to sell, offer for sale, distribute or use in a commercial enterprise the product in British Columbia.

## 3. Appointment of Stewardship Agency

Sections 2 of the Recycling Regulation provides:

- (2) *If a producer appoints an agency to carry out duties of the producer under Part 2 on behalf of the producer, the producer, before the agency begins to carry out those duties, must notify the agency in writing of the appointment, specifying the duties under Part 2 that the agency will perform on behalf of the producer.*
  
- (3) *Before an agency begins to carry out duties on behalf of a producer, the agency must*
  - (a) confirm in writing to a director the duties under Part 2 that the agency will perform on behalf of each producer that has joined the agency, and*
  - (b) comply with Part 2 in respect of the duties referred to in paragraph (a).*
  
- (4) *On the request of a director, an agency must provide the director with either or both of the following:*
  - (a) a list of producers the agency currently represents;*
  - (b) a copy of any notification the agency received under subsection (2).*

EPRA, a national not-for-profit organization incorporated to manage regulated recycling programs across Canada, is chartered with ensuring regulatory compliance of industry-led electronics stewardship programs. EPRA was established to assist its stewards in fulfilling their obligation to establish collection and recycling programs under applicable provincial Extended Producer Responsibility (EPR) legislation.

EPRA is incorporated under the Canada Not-for-Profit Corporations Act and is governed by a Board of Directors. A link to the program's Federal Corporation Information is available at:

<https://www.ic.gc.ca/app/scr/cc/CorporationsCanada/fdrICrpDtIs.html?corpId=7838409>

The EPRA Board of Directors in the 2016 Annual Report was comprised of nine members:

Lloyd Bryant, Chair	Independent Director
Brian Feeley	Apple Canada Inc.
Pete Gibel	Staples Canada
Lindsey LeClair	Best Buy Canada Ltd.
Peter Maddock	Panasonic Canada Inc.
Clint Mahlman	London Drugs Limited
Scott O'Connell	Dell
Jeff Van Damme	Samsung Electronics Canada Inc.
Harry Zarek	Compugen Inc

A list of the Directors is published yearly in the EPRA Annual Report. These Annual Reports are available at:

<http://recyclemyelectronics.ca/bc/about-epra/epra-annual-report/>

The Annual Report will report on significant changes to the agency's structure or governance if they occur.

EPRA operates a program in British Columbia for a wide range of electronic, electrical and other products and is responsible for overseeing the Program on behalf of its stewards, who are defined by the Regulation as the producers. The Program operates according to the Bylaws approved by the Board to manage the affairs of the Association. The Board of Directors has the responsibility for the overall stewardship of the organization and establishing the overall policies and standards for the organization. The program has been operational in BC since August of 2007.

Each of the program's stewards appoint EPRA as their stewardship agency as described in section 2(2) of the Regulation. EPRA supports and reports on the range of pollution prevention elements on behalf of its stewards, including conducting awareness campaigns on these priorities, Design for the Environment reporting, website information and education modules that are free and publically accessible. For those units requiring recycling, EPRA provides collection services throughout the province and ensure responsible recycling of those products collected.

EPRA represents approximately 1700 stewards for the products identified in our program Plan. A list of EPRA's stewards is available at:

<http://recyclemyelectronics.ca/bc/registered-stewards-remitters-pops/>

Information about the Program is available to stewards on our website at:

<http://recyclemyelectronics.ca/bc/stewards/registration-package/>

EPRA chairs a local advisory committee (LAC) to foster the exchange of information on our program and as a forum to discuss issues of local concern. This committee has BC based representatives who have experience with the electronics & recycling industry. Committee members are selected by the Executive Director and form a representative group that is knowledgeable of the industry and can provide meaningful input on the program. The EPRA BC LAC members draws on representatives from the local government, NGO's, local retailers and other relevant parties. Currently the 7 members of the committee meet twice per year.

## 4. Program Products

Section 4 of the Recycling Regulation provides:

*A producer must submit a product stewardship plan, at the time specified in the applicable Schedule, if any, and in a manner and format satisfactory to a director, for the products within the product category of the product the producer sells, offers for sale, distributes or uses in a commercial enterprise in British Columbia.*

The Program includes a wide array of electrical, electronic and other products including desktop and portable computers, printers, display devices, audio video products, telephones, medical devices, IT & telecomm equipment, testing & control instruments and electronic toys as defined in Section 3 of the Regulation. This includes electronic accessories for these products. The Program also covers 'orphaned' products in these categories where the manufacturer may no longer be in business. EPRA is not the only stewardship agency covering electronic or electrical products. Other agencies handle some of the products in this category.

A more detailed listing of the covered product categories is provided in Appendix A. In addition, there is a detailed list of products accepted for return available on our website at:

<http://recyclemyelectronics.ca/bc/what-can-i-do/recycle-what/>

At the time of filing, EPRA and other programs accept cell phones into their programs on behalf of their respective stewards. To avoid confusion for the public, EPRA accepts all phones at any of its depots throughout the province.

At the time of filing, EPRA and other stewardship programs accept small household batteries into their programs. EPRA manages batteries that are sold in or packaged with obligated electronics for which EPRA handles the collection and recycling. These batteries, embedded into products obligated under our program, are considered to be components of the electronic products and are therefore included in our program. EPRA will coordinate activities with the other programs managing batteries under the Electronic and Electrical product categories.

Several private companies have program plans filed with the province that may include products obligated under our program.

## 5. Stakeholder Consultation

Section 5(1)(b) of the Recycling Regulation provides:

*The producer has undertaken satisfactory consultation with stakeholders prior to submitting the plan for approval and will provide opportunity for stakeholder input in the implementation and operation of the product stewardship program*

During 2016, EPRA undertook a consultation process that provided meaningful opportunities for public consultation and comment. An overview of that process is included in Appendix B below.

Stakeholder input on the program is welcome at any time and is considered in program development.

## 6. Collection System and Consumer Accessibility

Section 5(1) of the Recycling Regulation provides:

- *(a) the plan will achieve, or is capable of achieving within a reasonable time,
  - (i) a 75% recovery rate or another recovery rate established by the director,
    - (A) for each subcategory listed in section 4 of Schedule 1 for the beverage container product category, and*
    - (B) for each product category covered by the plan, other than the beverage container product category, if required by the director.**
  - (ii) any performance requirements or targets established by the director.*
  - (iii) any performance requirements or targets in the plan.**
- *(c) the plan adequately provides for:
  - (i) the producer collecting and paying the costs of collecting and managing products within the product category covered by the plan, whether the products are currently or previously sold, offered for sale or distributed in British Columbia.*
  - (ii) with respect to the solvent and flammable liquids, pesticide, gasoline and pharmaceutical product categories,
    - (A) the collection of residuals and containers that are or were in direct contact with a residual, and*
    - (B) the management of residuals and containers collected.**
  - (iii) reasonable and free consumer access to collection facilities.*
  - (v) assessing the performance of the producer's product stewardship program.**

Since commencing operation in August of 2007, the Program has established a comprehensive network of permanent collection locations where the public can conveniently return electronics covered by the regulation for responsible recycling. There is no cost to the public for drop-off of program material. This network currently consists of a group of Return-it™ Depots operated by Encorp Pacific, local government locations, not-for profit organizations and other locations.

In 2016 this network had expanded to 197 collection sites providing convenient access throughout the province. In addition, there are approximately 65 Return to Retail (R2R) locations across the province to further enhance consumer convenience for a total of 265 locations. The number of collection sites has more than doubled since the time of filing of our last program plan.

Finding a drop-off location is easy for the consumer. They can simply enter their location or postal code on our website below:

<http://recyclemyelectronics.ca/bc/what-can-i-do/drop-off-centres/>

Recognizing that it is not possible to have depot coverage in all of the remote and rural areas of the province, EPRA has developed a criteria to ensure reasonable access as outlined in the Recycling Regulations. This criteria started with a premise of serving more than 97% of the provinces population and the current criteria accomplishes that target. Reporting on this criteria will be done by a professional firm specializing in GIS mapping and reporting.

For rural coverage the Program has adopted as a minimum criteria a catchment population of 4,000 within a 45 minute driving radius. For urban coverage (defined as a Census Metropolitan Area (CMA) by Statistics Canada) the Program has adopted a 30 minute driving radius. These criteria have been utilized by the Program to deliver collection coverage to more than 97% of the population of the Province. Collection sites used for this calculation will be shown on the depot locator on the EPRA website.

EPRA periodically reviews the coverage to ensure that the criteria commitments are met. For any rural locations which meet the catchment and driving range criteria for a depot but where permanent depots have not yet been located, the Program will seek to establish permanent collection sites. In the interim EPRA will conduct collection events in these areas and report on those events.

The criteria outlined above are seen as minimum requirements and the program is also willing to pursue other options in rural or remote communities where reasonable, viable options are available including periodically participating in collection events to augment the network and enhance consumer convenience. Wherever possible, the Program works to coordinate these collection events with other stewardship agencies.

For the period of time from plan approval until consultation begins for the next Program Plan, EPRA will work with the Regional Districts to identify underserved areas and begin exploring options for service to those areas.

In July of 2012, the BC Government regulations for Phase V became effective, which added a wide range of products to the EPRA BC program, including medical devices, telecomm equipment, etc. While some of the Phase V products were suitable for incorporation into the standard depot model for collection, other new products required the development of different service models. EPRA has several options available that provide convenient alternatives for the larger size and weight of some Phase V materials.

These options are described in more detail on our website at:

[www.return-it.ca/electronics/industry/b2b-options/](http://www.return-it.ca/electronics/industry/b2b-options/)

Once collected, the material is consolidated and shipped to approved processors for recycling.

Some of the products obligated under the EPRA Program have commercial value after their first use and these products often follow paths other than EPRA's end-of-life recycling. Products that are leased are often returned to the lessor who may refurbish these products and sell them outside of BC. There is also a robust aftermarket for used electronics. This is done outside of the program and can involve electronics being collected and transported outside of the province.

Diversion of regulated devices from landfill is an important focus of EPR programs. To that end, waste audits are a valuable measure of a Program's success. In conjunction with other stewardship agencies, EPRA has participated in six waste audits conducted by communities of various sizes to date. These audits have demonstrated that the EPRA's efforts have been successful in diverting our products from landfill. EPRA will continue its involvement in SABC's program to participate in waste audits undertaken by regional districts/municipalities and use the results to help guide improvements in the Program's performance.

EPRA does not use a recovery rate to track performance. This is an impractical measure because sales data is reported in units and collection is tracked by weight. In addition, some products are in a broken state when returned which renders them impossible to identify. Finally, our products are durable goods with lifespans measured in years or decades. All of this combines to make the conversion between units and weight inaccurate and impossible to do with a reasonable degree of accuracy. There are literally thousands of different items collected with ages varying vastly.

## **7. Consumer Awareness**

Annually EPRA will develop and roll out a communications plan with the following areas of focus:

- Create awareness of the EPRA Program, in particular the electronic products that will be accepted and where to take them for responsible recycling.
  - This will include working to improve awareness of products identified as having lower than average consumer awareness and reporting on that, and
  - Making consumers aware that batteries included in our products should be left in the product when dropped off for safe recycling
- Create awareness of environmental and data security risks associated with electronics not being properly managed.
- Ensure that the electronic products brand owners and retailers of regulated products are aware of their obligations related to the EPRA Program in BC. Invite participation in the EPRA program in order for the steward to easily and responsibly comply with the regulation.
- Ensure EPRA Drop-off Centers continue to be well informed regarding electronic products included in the Program and can provide accurate information to customers.

To accomplish this, a variety of communication materials will be deployed to facilitate education and awareness of the EPRA British Columbia Program.

- EPRA provides signage to the network of drop-off locations.

- Promotional material (for example brochures and tent cards) are made available for electronic product retailers to order and display. Examples of these can be found at:

<http://recyclemyelectronics.ca/bc/resources/poscommunications-materials/>

- Media campaigns are utilized to convey information about the EPRA British Columbia Program. Examples of the primary components of the campaign would be radio, print and online advertisements. For example, EPRA recently launched a new national consumer facing brand campaign that was promoted in the province with British Columbia specific print, radio and online advertisements. Research is conducted periodically to confirm that campaign messages resonate with residents to motivate them to e-recycle. In our most recent campaign, the vast majority of respondents felt that responsible recycling of electronics was important in helping to pay it forward environmentally. The current EPRA brand campaign was developed around the theme “The future is in your hands. Don’t let it go to waste.” It uses images of nature and a person holding an electronic device to demonstrate literally and figuratively that the future is in their hands. The pay it forward message is to help empower and motivate consumers to do the right thing for the environment by e-recycling their EOLE through EPRA British Columbia collection locations. On the advertisements there is a link to, or mention of, the website URL so that residents can find out more information on the location of the drop-off locations, obligated products and the associated EHF.
- Since 2012 EPRA has conducted regular, extensive, consumer research to determine attitudes, motivators and habits. This research has been used to develop a number of consumer awareness programs designed to inform consumers about electronics recycling. This public opinion polling will be conducted on an annual basis to determine awareness of electronics recycling in the province and this information will be outlined in EPRA’s Annual Report. This polling is conducted by an independent third party organization experienced in these types of surveys and participants will provide a representative sample of population and region within the province.
- In addition to consumer awareness levels, consumer research can provide additional information that indicates awareness is higher for certain product categories. The information provided through this measure helps identify opportunities for targeted campaigns to address lack of awareness for specific product categories. The Program will continue to conduct surveys that measure awareness of product categories in addition to the Program’s overall consumer awareness level. Using the results from these surveys EPRA will:
  - Identify opportunities to raise awareness in product categories with lower than average awareness
    - Beginning in 2019 EPRA will work on Musical Instruments and Medical Devices as categories for additional awareness focus
  - Develop awareness campaigns and strategies to target these product categories
  - Provide qualitative reporting on our efforts in these product categories with lower awareness.

- The EPRA British Columbia website was completely revised recently and will continue to be updated on an ongoing basis to reflect any changes to the program. It will continue to clearly outline all of the materials acceptable for recycling as well as offer a prominently displayed Collection Depot locator with all of the locations in the province.
- EPRA provides free-of-charge videos on e-recycling that are available for viewing and downloading on the EPRA British Columbia website.

Examples include, “**What happens to end-of-life electronics?**” and it illustrates and explains to viewers how end-of-life electronics (EOLE) that are dropped off at an EPRA Drop-off Centre are recycled responsibly. This video is available to view at:

<http://recyclemyelectronics.ca/bc/what-can-i-do/where-does-it-go/>

“**What is the EHF?**” and it explains what the EHF is and why it is charged. This video was developed to help consumers learn about the EHF and also to assist Retail to train their staff on how to answer questions from consumers on the EHF. It can be viewed at:

<http://recyclemyelectronics.ca/bc/stewards/what-are-environmental-handling-fees/>

- The EPRA toll-free helpline service accommodates inquiries from British Columbia residents and other stakeholders and will continue to be an important communication tool. All calls and email are answered by EPRA call center staff who are trained to answer British Columbia specific calls. In keeping with our Bilingual country, English and French staff are available.
- EPRA is also currently working with other SABC members to support the RCBC hotline and the BCrecycles.ca website. These tools provide a single source for the public to get information about a wide range of items that can be recycled under the province’s various EPR programs.

EPRA is committed to maintaining strong consumer awareness with a goal of 75% of the BC population being aware of a place to recycle unwanted electronics in an environmentally friendly way. We believe this is a reasonable level of awareness considering most commercial brands fall into the 40% to 70% awareness range with only iconic brands having recognition significantly higher than 75%.

## 8. Management of program costs

Section 5(1) of the Recycling Regulation provides:

- *(c) the plan adequately provides for:*
  - (i) the producer collecting and paying the costs of collecting and managing products within the product category covered by the plan, whether the products are currently or previously sold, offered for sale or distributed in British Columbia.*
  - (v) the management of costs incurred by the program.*
  - (v) assessing the performance of the producer's product stewardship program*

The Program has developed a cost effective system to recycle obligated end-of-life electronic products in accordance with the requirements of the Electronics Recycling Standard (ERS) as updated from time to time. Obligated program material may be brought in for recycling at no charge

to our collections locations across the province. EPRA management regularly reviews the program and shares best practices from across all of our provincial programs to ensure that the program delivers a high quality service at the lowest practical cost.

The Program is funded by an environmental handling fee (EHF) charged on obligated products. This fee is remitted to the Program on the distribution and sale of new products in the Province. The EHF, which is paid once in the supply chain, is not a tax or a refundable deposit. The EHF's are set at a level which covers the costs of administration, collection, transportation and responsible recycling of obligated products covered by the program including historic waste.

EHF's are reviewed regularly to ensure that they are no more than is necessary to cover the ongoing cost of operating the program and maintaining the appropriate reserves, consistent with EPRA's not-for-profit mandate.

The Program's financial statements will be audited annually and published on its website as part of its Annual Report. The Annual Report includes key financial information like revenues and expenditures along with additional performance measures such as cost per tonne and other non-financial measures including the number of collection locations and tonnes collected. This non-financial information is also audited before being reported, thereby being in compliance with the current requirements for the Annual Director's Report to the Province.

The program provides an efficient, effective deployment of the fees that are collected, ensuring that service providers are reimbursed at reasonable, competitive rates.

EPRA pays for the collection, transportation and recycling of the products collected in our program. These services are provided through contracts with various suppliers. Transportation, consolidation and recycling services are typically awarded via a competitive bid process while collection services are compensated on a per tonne rate that is reviewed on a regular basis.

Factors considered in establishing and adjusting the rates over the years include:

- Changes in the product features that impact handling, including size, weight and material composition
- Labour rates
- Facility requirements for collection and storage of product
- Comparable rates in other jurisdictions and for similar service

Collection rate reviews generally run concurrent with our contract period, however off-cycle reviews occur when merited based on substantial movement in one or more factors.

The most recent collection rate adjustment was initiated by EPRA and implemented in January of 2018. Our next consultation with the collection service providers will coincide with our next Program Plan consultations.

In the interim, the Program reviews and addresses unique concerns that may be raised regarding program compliance or funding. A current example of an investigation of this nature is a depot reportedly charging both the EPRA program for collection and also charging the Regional District for the same service. All concerns are addressed in a professional and transparent manner, ensuring a responsible, sustainable program.

## 9. Management of Environmental Impacts

Section 5(1) of the Recycling Regulation provides:

- *(c) the plan adequately provides for:*
  - (v) the management of environmental impacts of the program.*
  - (v) assessing the performance of the producer's product stewardship program.*
  - (vii) eliminating or reducing the environmental impacts of a product throughout the product's life cycle.*
  - (viii) the management of the product in adherence to the order of preference in the pollution prevention hierarchy. The pollution prevention hierarchy is as follows in descending order of preference, such that pollution prevention is not undertaken at one level unless or until all feasible opportunities for pollution prevention at a higher level have been taken:*
    - (a) reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency;*
    - (b) redesign the product to improve reusability or recyclability;*
    - (c) eliminate or reduce the generation of unused portions of a product that is consumable;*
    - (d) reuse the product;*
    - (e) recycle the product;*
    - (f) recover material or energy from the product;*
    - (g) otherwise dispose of the waste from the product in compliance with the Act.*

### Reduce

Electronics Product Stewardship Canada (EPSC) represents major electronics and IT equipment brand owners in Canada on sustainability issues. The *Design for Environment* (DfE) Report is issued annually (the 2016 edition is available here: <http://epsc.ca/design-for-the-environment-report/>), which highlights the industry's progress related to design for the environment, along with the many technological advances that are creating change in electronics design. The electronics sector is shifting to more mobile, multi-functional and light weight products. This light weighting means less material being introduced into the market which results in less material to collect at end-of-life. EPRA will make this report available and will include a link to it in our annual Report to the Director.

### Reuse

Reusing electronic products is promoted through the communications and public awareness program where markets and opportunities for reuse in-province exist. Many of our stewards have programs for recovering useable electronics for refurbishment and resale. In addition, there are a number of market options available for consumers to resell (or gift) used electronics. Finally, there are commercial and non-profit organizations which recover and resell used electronics.

EPRA has undertaken several measures to support the market for reuse and refurbishment of used electronics.

One of these initiatives is the BC Materials Exchange (BC IMEX) for electronics. EPRA has partnered with the Recycling Council of British Columbia (RCBC) to develop the BC IMEX for electronics. This program is a free online listing service that works to help businesses find alternative solutions for their used electronics and other surplus materials.

Another initiative is EPRA’s Electronics Reuse and Refurbishing Program (ERRP) which is designed to foster safe and environmentally responsible reuse and refurbishing of electronics by recognizing reusers who meet the criteria outlined in the program. This provides donors with a level of assurance that products reused through these organizations will be handled in a responsible manner.

**Recycle**

Responsible recycling and processing of end-of-life electronics is the hallmark of EPRA BC’s program. As outlined above, EPRA encourages reuse of working electronics prior to reaching end of life. Recycling, which diverts electronics waste from landfill and illegal export, is a major focus of this program. Typically, recycling involves some form of “primary” or initial processing, which may include dismantling and sorting of material by hand or by more elaborate mechanical means. Further manual or mechanical separation of materials by another vendor or vendors is considered “downstream” processing. Both Primary and Downstream recyclers are audited and approved in accordance with the Electronics Recycling Standard (ERS) to ensure that materials are handled in a safe, secure and environmentally sound manner.

To ensure that all materials collected under the program are responsibly recycled, EPRA contractually requires all recyclers to meet and maintain the requirements of the Electronic Recycling Standard (ERS) and to have successfully completed the audit and approval process which may be updated from time to time in order to ensure they meet the ongoing needs of the programs. Additional information of the Recycler Qualification Process can be obtained at [www.rqp.ca](http://www.rqp.ca)

EPRA collects a wide array of different products but the current recycling methods result in materials that fit mostly into the major categories outlined below:

Material	Process
Leaded Glass	Smelted to reclaim lead
Aluminum	Smelted for reclaim
Circuit Boards	Smelted to reclaim metals
Copper	Smelted for reclaim
Ferrous Steel	Smelted for reclaim
Plastics	Pelletized for reuse
Wire and Cables	Smelted for reclaim
Batteries	Mechanically or Thermally separated for metal recovery

EPRA will continue to manage collected products in this fashion whenever feasible and economically viable, recognizing that the management of commodities is subject to change.

**10. Dispute Resolution**

Section 5(1) of the Recycling Regulation provides:

- *(c) the plan adequately provides for (vi) a dispute resolution procedure for disputes that arise between a producer and person providing services related to the collection and management of the product during implementation of the plan or operation of the product stewardship program.*

The Program has incorporated normal commercial dispute resolution provisions into contracts with third parties. EPRA encourages a timely, staged approach to resolving issues and addresses disputes with service providers first through a local internal review process which encourages a quick fair resolution. If unresolved at the local level, senior management will become involved in an attempt to facilitate resolution. Should these steps leave unresolved disputes they would be addressed using standard commercial legal procedures.

## 11. Performance Monitoring and Reporting Commitments

Section 5(1) of the Recycling Regulation provides:

- *(a) the plan will achieve, or is capable of achieving within a reasonable time:
 
  - (ii) any performance requirements or targets established by the director.
  - (iii) any performance requirements or targets in the plan.*
- *(c) the plan adequately provides for (v) assessing the performance of the producer's product stewardship program.*

EPRA has committed to reporting on a core set of measurements including operational, accessibility and awareness metrics. Reporting commitments are outlined in the table below:

<b>Metrics</b>	<b>Performance Targets and Reporting Commitments</b>
Governance	Significant changes to the agency's structure or governance
<b>Products sold and collected</b>	
Amount of product sold (units)	Annually
Amount of product collected (weight)	Annually *3 <sup>rd</sup> party non-financial assurance
Amount of product collected by regional district	Annually
Amount of product collected per capita by regional district and total for the province	Annually
<b>Collection System and Accessibility</b>	
Location and number of contracted collection sites, and changes in location and number from previous report	Annually *3 <sup>rd</sup> party non-financial assurance

Number of contracted sites by RD	Annually
Number and location of contracted collection events by RD	Annually
Locations of underserved area according to the accessibility standard as defined in the plan along with the events held to provide accessibility in these areas	Annually
Percent of population with access to a collection location	97% target Every other year starting 2018. Report standard and methodology used
Qualitative report on product on categories with low awareness	Annually
<b>Waste Audits</b>	
The results of local government waste composition studies identified in kilogram (kg) per capita of program material and the total amount batteries from each of the studies	Annually when SABC participates in the waste audit
<b>Consumer Awareness</b>	
Percentage of population aware of where to take electronics for recycling	75% target Annually Methodology used, including survey question
<b>Management of Program Costs</b>	
Program costs per tonne of material collected	Annually
Financial statements	Annually 3 <sup>rd</sup> party audited
<b>Management of Environmental Impacts</b>	
Efforts to reduce environmental impacts throughout the product life cycle	Annually through link to Design for Environment (DfE) report
Management of collected products to final disposition	Report by Material type, Percentage of total tonnage, Processing methods, Level of pollution prevention hierarchy Annually *3 <sup>rd</sup> party non-financial assurance

\*3<sup>rd</sup> non-financial assurance commitments are subject to the ministry requirements and guidance.

## APPENDIX A

The following product categories are covered in whole or part by the EPRA program:

Schedule 3, section 2(1) BEFORE amended by BC Reg 297/2009 as amended by 132/2011 effective July 1, 2012.

Subsection (2) the electronic and electrical product category consists of the following:

- (a) computers that are designed
  - (i) for desktop use by an individual,
  - (ii) for desktop use as a server, or
  - (iii) to be portable, except hand-held devices;
- (b) desktop printers;
- (c) televisions.

### **Electronic and electrical product category — July 1, 2010**

**2.1** Effective July 1, 2010, the electronic and electrical product category is expanded to include the following products:

- (a) all of the following, if for desktop or portable use:
  - (i) scanners;
  - (ii) fax machines;
  - (iii) copying equipment;
- (b) telephones and telephone answering systems;
- (c) mobile devices designed primarily to connect to a cellular or paging network, including, without limitation, phones, cellular personal digital assistants and pagers;
- (d) electronic or electrical audio visual and consumer equipment, including, without limitation, radio sets, cameras and video recorders designed for non-professional use, projectors, audio players, recorders, headphones, microphones, amplifiers, equalizers and speakers;
- (g) batteries for use in an electronic or electrical product referred to in this section, including primary and rechargeable batteries. (Note: For Item (g) EPRA only collects batteries that are embedded in the devices we collect under our program. Batteries embedded or sold with the devices in our program are considered to be components of the device.

### **Electronic and electrical product category — July 1, 2012**

**2.3** Effective July 1, 2012, the electronic and electrical product category is expanded to include the following products:

- (b) electronic or electrical tools, other than large-scale stationary industrial tools, including, without limitation,
  - (vi) slot machines, and
  - (vii) bar code and point-of-sale scanners;
- (c) electronic or electrical appliances that automatically dispense money or products on demand;
- (d) electronic or electrical medical devices or equipment for detecting, preventing, monitoring, treating or alleviating illness, injury or disability, other than a medical device that has been implanted in a person or that has been exposed to infectious matter;
- (f) electronic or electrical information technology or telecommunication devices, equipment or media, including
  - (i) typewriters,
  - (ii) pocket and desk calculators,

- (iii) printers, scanners, fax machines, and copying equipment,
  - (iv) network and telecommunication equipment,
  - (v) devices, equipment or media for collecting, storing, processing, presenting or communicating information, including, without limitation, sounds and images,
  - (vi) telex machines, and
  - (vii) computer terminals or systems,
- but not including anything described in section 2 or 2.1;
- (g) electronic or electrical toys, excluding leisure and sports equipment, including, without limitation, trains, car racing sets, cars and trucks, including remote control and ride on toys, video games and video gaming equipment and consoles,
  - (h) electronic or electrical monitoring and control instruments, including, without limitation, alarm systems, heating regulators and appliances for measuring, weighing or adjusting, but not including thermostats or smoke detectors;
  - (i) electronic or electrical audio visual and consumer equipment or media, including, without limitation, musical instruments, products, equipment or media for recording, reproducing or distributing sound or images;
  - (j) accessories for use with any products referred to in this Appendix, including cables, adapters, connection cords and chargers;
  - (k) batteries for use in an electronic or electrical product referred to in this section, including primary and rechargeable batteries. (Note: For Item (k) EPRA only collects batteries that are embedded in the devices we collect under our program. Batteries embedded or sold with the devices in our program are considered to be components of the device.

Notes:

1. The Program does not include items weighing in excess of 200 kgs.
2. The Program does not include any medical device that has been implanted in a person or that has been exposed to infectious matter
3. The Program does not include fixed installation electrical and/or mechanical devices. (i.e. a device that is wired directly into the structure, requires professional installation and/or cannot be readily removed without altering the electrical connections.
4. The list of Product Definitions and Clarifications may be revised periodically by the Program.
5. While adhering to program principles, additional or expanded descriptions of eligible products and adjustment of program product categories may be necessary as technology changes.

## Appendix B: Stakeholder Consultations

### Part I: Overview:

As required under Section 5(1)(b) of the Recycling Regulation, in 2016 EPRA undertook a consultation process that provided meaningful opportunities for public consultation and comment. Key aspects of the consultation included:

- In May of 2016 posting reference to the Plan renewal on the EPRA British Columbia website: <http://recyclemyelectronics.ca/bc/plan-renewal/> and an invitation for comments.
- Informing via email, the industry stewards of the public consultation notice and method for feedback. As well as informing via RCBC and CWMA newsletters a wide range of stakeholders of the consultation sessions
- Public consultation on May 18, 2016 at the RCBC conference in Whistler, BC
- Public consultation via webinar on September 7, 2016 for interested parties to participate who were not able to attend at RCBC, including direct outreach to local government and other key stakeholders in British Columbia, informing them of the public consultation.
- Public presentation of the Program Plan to attendees of the SIWMA conference in Williams Lake on September 16, 2016
- Consultation comments were accepted until September 30, 2016.

Consultations were transparent and public and where possible comments were included along with a response. Some like comments were aggregated to simplify the reply.

### Part II: Sessions and Attendees:

#### **1. *Public Consultation #1: Recycling Council of British Columbia Annual Conference (Whistler, BC: in-person) – May 18, 2016. Attendees (26):***

- Canadian Electronics Stewardship Assn
- Electronics Product Stewardship Canada
- Dell
- Retail Council of Canada (2)
- Encorp Pacific (3)
- Product Care Association (2)
- RD Bulkley Nechako
- Canadian Wireless & Telecom Association
- Ministry of the Environment (2)
- Canadian Battery Association
- RD Metro Vancouver
- Association of Home Appliance Manufacturers
- Coast Waste Management Association
- Heartland Landfill
- City of Abbotsford
- RD Kitimat-Stikine
- London Drugs
- City of Dawson Creek
- BC Technology for Learning Society
- Ronin8

**2. Public Consultation #2: via Webinar (on-line) – September 7, 2016. Attendees (24):**

- BC Product Stewardship Council
- RD Metro Vancouver
- BC Bottle Depot Association
- RD Central Okanagan
- DWK Research
- RDBN Bulkley Nechako
- Coast Waste Management Association
- RD Alberni-Clayoquat
- Town of Mission
- Northern Environmental Action Team
- RM Recycling (2)
- Product Care Association (3)
- BC Technology for Learning Society
- RD Thompson Nicola
- RD Nanaimo
- RD North Okanagan
- Pender Island Recycling Society
- RD Fraser Fort George
- Willow Brook Recycling
- Encorp Pacific

**3. Public Consultation #3: Southern Interior Waste Management Association conference – (Williams Lake – in-person, Sept 16, 2016) Attendees (26):**

- RD Metro Vancouver
- Multi-Material BC (MMBC)
- RD Squamish – Lillooet
- RD Columbia Shuswap
- R D North Okanagan
- Central Cariboo Disposal Services Ltd.
- R D Okanagan-Similkameen
- RD Thompson-Nicola
- BC Sustainable Energy Association
- Recycling Council of British Columbia
- RD Columbia Shuswap
- RD Fraser Valley
- Thompson Energy Association
- Recycling Nicola
- RD Columbia Shuswap
- RD Cariboo
- R D East Kootenay
- Huska Holdings Ltd.
- R D Okanagan-Similkameen
- Cariboo Chilcotin Conservation Society
- Multi-Material BC (MMBC)
- The Potato House Project
- City of Kelowna
- R D Kootenay Boundary

### Part III: Written Submissions Received:

- Salt Spring Island Recycling Depot (July 29, 2016)
- Galiano Island Recycling Resources (July 29, 2016)
- Mayne Island Recycling Society (July 29, 2016)
- Pender Island Recycling Society (July 29, 2016)
- Metro Vancouver (September 30, 2016)

### Part IV: Issues Raised & EPRA Responses:

<i>Challenge around Millennials are not awareness, but action. Need to reach them better through social media and on-demand/on-line content</i>	We have identified this age segment as an area of focus, and they are part of our on-going media strategy	Unknown
<i>Where are we seeing the biggest impacts related to the light-weighting of products? Is there an opportunity to look at the number of devices collected instead of the weight?</i>	We have identified and reviewed this issue, and address the concept in the Program Plan.	Peter Holgate, Ronin8
<i>Reuse not adequately addressed in plan. Would EPRA BC consider reuse targets as currently in-place in Ontario and Quebec programs?</i>	Regulations are different in ON and QC. EPRA BC believes that it adequately and fairly addresses reuse in the Program Plan based on the context of the local BC market	Mary-Em Waddington, CFS
<i>ICI generated end-of-life electronics very different then residential waste electronics. Consider dropping ICI such as Quebec has done.</i>	Scope and sector of regulated electronics is a regulatory issue and not one that EPRA can address in our Program Plan	Shelagh Kerr, EPSC
<i>Data protection and privacy concerns are paramount with collected end-of-life electronics collected.</i>	EPRA has systems in place to provide reasonable security for data on devices given to us. In addition our ERS addresses data destruction at the recycler. However, we always recommend that consumers take measures including wiping data before reusing or recycling their devices	Unknown
<i>With CCME looking to landfill diversion as a key metric, should that be a measure considered for EPRA BC?</i>	We do believe this can be important data and it is reviewed when available from those parties conducting the audits.	Unknown
<i>Method used to determine the handling fees for collectors under the program?</i>	Fees are determined by looking at market conditions	Corrine Atwood, BCBDA
<i>Addition of cell/mobile phone collection under EPRA program and coverage/impacts? Will depots be compensated for these devices as well?</i>	Yes, collectors will be compensated for cell phones as they are with all of our other program material	Corinne Atwood, BCBDA

<i>Mobile collection on annual basis for remote communities?</i>	Rural and remote collection is addressed in our Program Plan	David Kennedy, DK Associates
<i>Use of local government waste composition findings to assist in calculating revised tonnage numbers?</i>	We do believe this can be important data and it is reviewed when available from those parties conducting the audits.	Andrew Doi, Metro Van
<i>Consideration of utilizing local governments for large volume pick-ups and/or clean-up of abandoned waste</i>	EPRA is working with local governments on this topic and participates in the working group addressing abandoned waste	Andrew Doi, Metro Van
<i>It is getting harder for depots to recycle these inkjet and toner cartridges as the recyclers only want very specific types and brands. They should all be included in the EPRA program</i>	. We will refer this comment to the Ministry for interpretation. Their email address is: <a href="mailto:ExtendedProducerResponsibility@gov.bc.ca">ExtendedProducerResponsibility@gov.bc.ca</a>	Peter Grant, Salt Spring Island Community Services
<i>Here is our main concern. The Electronics Stewardship Program payments we receive for collecting these materials are trending down. With the ever-lighter weight of electronics, we end up working more for less money.</i>	EPRA conducts periodic reviews of fees paid to collectors to insure that we are providing reasonable compensation based on market conditions	Chris MacDevitt, Galiano Island Recycling Kim Harris, Mayne Island Recycling
<i>We are pleased to be paid something for the transportation of electronics under your program, but with the lower weights and increased costs of ferries, insurance and labour, our remuneration is falling short of our costs.</i>	Compensation for service is done via contract between EPRA and service providers. Those contract conditions are negotiated and not part of the consultation process.	Chris MacDevitt, Galiano Island Recycling Kim Harris, Mayne Island Recycling
<i>Compensate collectors. Although some of the programs have achieved stellar recovery rates, many collectors are not compensated for their activities.</i>	EPRA does compensate collectors and has good recovery weights as a result	Andrew Doi, Metro Van
<i>Data Collection. Formalize the collection of data, including options that exist outside of the official EPR collection network. If ‘competing’ collectors do not have an incentive to report data, paying for data or providing an incentive to report should be considered ‘in-scope’ for program obligations.</i>	Much of the collection outside of the EPRA program is done in the commercial market where compensation is unlikely to produce reporting. There is also a portion of this market where the activity is suspect and these organizations will not even acknowledge that it is happening	Andrew Doi, Metro Van

<p><i>Options for Local Government. All EPR programs should develop an arrangement for local governments who receive, or pick-up illegally dumped material, to be paid for managing and handling this material, whether or not the facility is designated as a depot</i></p>	<p>EPR has initiated a pilot program to provide compensation to local government in certain circumstances. It has been well received.</p>	<p>Andrew Doi, Metro Van</p>
<p><i>EPR should be commended for its broad collection network, innovation in measuring performance, comprehensive recycling and reuse qualification programs, and consumer education and outreach initiatives</i></p>	<p>Thank you.</p>	<p>Andrew Doi, Metro Van</p>
<p><i>The 2015 Metro Vancouver Waste Composition Study estimates that approximately 40% of the e-waste found in the garbage was from the product categories included in the EPR Program</i></p>	<p>EPR collect the widest range of e-waste categories so it is no surprise that our products constitute 40% of e-waste. However, those same studies show that e-waste in general makes less than 2% of the overall waste stream</p>	<p>Andrew Doi, Metro Van</p>
<p><i>The EPR Stewardship Program Renewal Plan includes a small number of typos and awkward sentences, which are noted in the attached PDF document.</i></p>	<p>These have been corrected in the final version.</p>	<p>Andrew Doi, Metro Van</p>
<p><i>Program Products, Page 2: “The Program includes a wide array of electrical, electronic and other products including... non-cellular telephones...” Recognizing that this likely due to changing conditions since this version of the Plan (August 2016) was drafted, but the Plan should be revised to include cellular and non-cellular telephones</i></p>	<p>These have been revised in the final version.</p>	<p>Andrew Doi, Metro Van</p>
<p><i>Collection System and Consumer Access, Page 3: EPR has been at the forefront of EPR programs working with local governments and other collectors who are not official depots but regularly receive materials and/or clean-up materials that are dumped illegally. Please consider describing these alternative collection channels in the Plan</i></p>	<p>At present this is a pilot program. Although it has been successful so far, we need to further evaluate the results in the broader context before incorporating it into our Program Plan</p>	<p>Andrew Doi, Metro Van</p>

<p><i>Collection System and Consumer Access, Page 4: Consider describing the common “b2b” collection practices in the Plan. Some of these collection options may be suitable for other stakeholders</i></p>	<p>Our various B2B collection methods are outlined on the website and are public information available to all</p>	<p>Andrew Doi, Metro Van</p>
<p><i>Performance measurement summary and reporting commitments, Page 7: “Performance Measure: 3. Percentage of Population aware of where to take electronics for recycling/Target: 3 year rolling average of 70%/Frequency: Study done every 2 years”. How does the program intend to calculate a 3 year rolling average when the data inputs are derived every 2 years? This needs to be clarified</i></p>	<p>This has been revised in the final version. The study will be done annually.</p>	<p>Andrew Doi, Metro Van</p>

## Part V: Sample of Notice of Consultation:

[RCBC Member Newsflash] Notice of Public Consultation - EPRA BC  
End-of-Life Electronics Stewardship Plan Renewal



May 10, 2016.

[Electronic Products Recycling Association British Columbia \(EPRA BC\)](#) will be holding a public consultation for the renewal of the EPRA BC End-of-Life Electronics (EOLE) Stewardship Plan which is proposed for 2017.

EPRA BC operates as part of the Electronic Products Recycling Association (EPRA) and is responsible for managing the end-of-life recycling program on behalf of manufacturers, retailers and distributors of electronics in BC and pursuant to the [BC Recycling Regulation](#).

A copy of the Draft Stewardship Plan is posted for review on the program website at: [recyclemyelectronics.ca/bc/plan-renewal/](http://recyclemyelectronics.ca/bc/plan-renewal/)

EPRA is inviting you to participate in the public consultation. The scheduled consultation date is:

Date: Wednesday May 18, 2016

Time: 10:00am – 11:00am PST

Location: RCBC Conference, Fairmont Chateau Whistler Resort, Whistler B.C.

Written comments will also be accepted. To participate and provide written feedback on the EPRA BC EOLE Stewardship Plan Renewal, please send your comments by July 31, 2016 to [renewalcomments@epra.ca](mailto:renewalcomments@epra.ca) or by mail to:

EPRA BC

206 – 2250 Boundary Road

Burnaby, BC

V5M 3Z3

For further information regarding the EPRA BC EOLE Stewardship Plan Public Consultation, please contact Craig Wisehart, Executive Director EPRA Western Canada at [craig.wisehart@epra.ca](mailto:craig.wisehart@epra.ca).

The screenshot shows a web browser window with the URL [recyclemyelectronics.ca/bc/plan-renewal/](http://recyclemyelectronics.ca/bc/plan-renewal/). The page header includes a "Contact Us" link and a "FIND A DROP-OFF LOCATION NEAR YOU" section with a search input field labeled "address or postal code" and a red "SEARCH" button. The EPRA logo, featuring a green maple leaf and the text "British Columbia epra Electronic Products Recycling Association", is positioned on the left. Below the header, the main heading reads "EPRA BC Program Plan Renewal" with a breadcrumb trail "Home > EPRA BC Program Plan Renewal". A central text box contains the following information: "Click [here](#) to review the EPRA BC Program Plan Renewal. To provide any feedback on the EPRA BC Program Plan Renewal, please send your comments to [renewalcomments@epra.ca](mailto:renewalcomments@epra.ca) on or before September 30, 2016." To the right, a sidebar section titled "Why it matters ..." includes the heading "RECYCLE WHERE?" and the text "Find the authorized drop-off point closest to you!".