



EPRA
ELECTRONIC PRODUCTS
RECYCLING ASSOCIATION

STEWARDSHIP PLAN
2012-2016

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i. Introduction

Overview

In the last decade, product stewardship programs have grown in popularity across Canada and around the world since they allow governments to divert materials from the waste stream and improve recycling efforts by shifting the responsibility and cost of recycling from taxpayers to the producers and consumers of the products. In BC these principles are incorporated into the requirements of the *BC Recycling Regulation*.

The electronics industry has worked proactively with the British Columbia government since 2002 to develop the Electronic Stewardship Association of British Columbia (ESABC), an industry-led, not-for-profit electronics stewardship organization which operates a stewardship program (the "Program") in accordance with the requirements of the Recycling Regulation and industry developed recycling standards which ensure that all products collected and processed by ESABC are handled safely and not shipped offshore to developing countries.

The original Stewardship Plan (the "Plan") was approved by the BC Ministry of Environment (MOE) in December of 2006. The Program commenced operation in August 2007. The Plan was amended to include additional products in September 2009 and April 2010 and further amended to include a comprehensive suite of performance measures approved by the Director in July 2010.

In accordance with the requirements of their approved stewardship plan, the Program has developed and delivered an effective, cost efficient, environmentally and socially responsible, electronics recycling program to consumers and businesses for regulated Phase I and II electronic products on behalf of more than 1600 members.

As indicated in our letter of December 15, 2011 to the Director, it is the intention to shift the responsibility for the electrical and electronics collection and management program operated under the approved ESABC stewardship plan to the newly formed Electronics Product Recycling Association (EPRA). Under the 2012 – 2016 Stewardship Plan originally submitted by ESABC, all obligations and responsibilities will be assumed by EPRA.

Regulatory Context

This Stewardship Plan is prepared to cover the second five years (2012-2016) of operation of the Program in accordance with the requirements of Section 6 of the *BC Recycling Regulation*. It also addresses further expansion of the Program to include additional selected Phase IV products set out in Schedule 3, Section 2.2 of the *Recycling Regulation* commencing July of 2012.

Program Development

Phase I & II - 2007-2011

The original Stewardship Plan was submitted to the BC Ministry of Environment in October of 2006. The Plan was approved in December of 2006 and the Program officially launched on August 1, 2007 with Phase I products. The Program expanded to include Phase II products as of July 1, 2010. A list of the current Phase I and II products covered by the Plan up to July 1, 2012 is appended as Exhibit "A".

Since the Program commenced operations in August of 2007 the Program has:

- Increased the amount of electronic product collected year over year by 20% or more;
- Responsibly recycled more than 50,000 metric tonnes of electronics;
- Established a network of more than 110 depots (covering over 97% of the province) where consumers can drop off electronics without charge;
- Held collection events in the few areas where it has not proved possible to date to establish depots;
- Established a large volume pick-up policy for large volume generators;
- Expanded its collection network to include voluntary return to retail;
- Supported the BC Electronics Material Exchange (BCMEX) for electronic products delivered by the Recycling Council of British Columbia (RCBC);
- Developed a Reuse Standard to foster responsible practices for the reuse and refurbishment of electronics; and
- Collaborated with other Canadian electronics stewardship programs to implement harmonized practices and solutions.

Phase IV – 2012-2016

The Program will be expanding its existing scope of operations and providing services for individual consumers and businesses for obligated Phase IV products scheduled for implementation on July 1, 2012. The proposed list of all products which will be covered by the Program as of July 1, 2012 is appended to this plan as Appendix "B".

In addition to expanding the products covered by the Program, the Program is committed to continuous improvement over the next five years by:

- Employing industry leading standards for product recycling, refurbishment and reuse;
- Sustaining consumer awareness and encouraging voluntary participation in the program;
- Continuing to expand the consumer collection network to increase accessibility and convenience;
- Developing and implementing new service delivery models for Phase IV products; and
- Implementing new performance indicators to track operational, accessibility, awareness and environmental aspects of the program.

ii. Program Overview

Mandate & Purpose

The Program was established under the British Columbia Society Act to develop, implement and manage an approved stewardship program that is designed to allow obligated electronics producers to meet their regulatory obligations under the *British Columbia Recycling Regulation*.

The Program is accountable to its members, the general public and the government of British Columbia, through the Ministry of Environment. The Program is publically accountable through its Annual Report. The Program also meets its obligations, as outlined in the *BC Society Act*, and files the required reports with the Corporate Property Registry Branch of the Ministry of Finance.

Governance

The Program is a member based association representing obligated producers of electronic products, as defined in the *Recycling Regulation*. The Program operates according to the Bylaws approved by the Board to manage the affairs of the Association. The Board is elected by the members of the Association.

The Board members of the Program are committed to maintaining a high standard of corporate governance. The Board of Directors has the responsibility for the overall stewardship of the organization and establishing the overall policies and standards for the organization. For a current list of the Board of Directors see the Association's website.

The Program collaborates on an ongoing basis with the BC Government, other BC Stewardship organizations, key provincial stakeholders such as regional governments, NGOs including the RCBC. Pursuant to the Bylaws, the Board has struck a Stakeholder Advisory Committee to ensure input to the Board on the stewardship program from a broad spectrum of interested parties. For a list of the current members of the Advisory Committee see the Association's website.

Program Principles

The Program has adopted the following Guiding Principles to ensure their stewardship program serves the consumer and program members in an environmentally sound, cost effective and equitable manner:

1. **Level playing field:** All obligated producers will participate in an approved stewardship program to maintain a level and competitive playing field.
2. **No cross-subsidization:** Any Environmental Handling Fee (EHF) charged on a product category will accurately reflect the costs of managing that category within the program, and will not subsidize the costs of managing other product categories.
3. **Environmental improvement:** Policies and programs will be used to improve the programs environmental performance by establishing industry-leading standards for product reuse and processing, increasing accessibility to the program, raising consumer awareness and driving economic efficiencies.
4. **Operational Efficiencies:** ESABC will provide value to members by driving operational efficiencies, through nationwide harmonization and by leveraging competitive markets for services to ensure financial resources are used in an effective and efficient manner.
5. **Harmonization:** To the greatest extent possible the ESABC program will work with other Canadian electronics stewardship programs to achieve harmonization in order to leverage economies of scale and minimize producers' compliance burdens.

These principles align with the BC Ministry of Environment Business Plan Principles and the CCME Canada Wide principles for Electronics Product Stewardship. They ensure that obligated products are diverted from landfills, processed and recycled in a manner that safeguards the environment, worker health and safety and prevents obligated electronics from being exported to developing countries.

iii. Stewardship Plan 2012-2016

1.0 Executive Summary

In the first five years of operation (Phase I and II), the Program has successfully created a comprehensive, accessible, cost effective, environmentally and socially responsible, electronics recycling program for British Columbia. A thorough suite of nine key performance indicators were developed and implemented for those obligated electronic products to be recycled. These indicators are representative of the program's performance as it relates to operations, financial management, access to collection facilities and program awareness.

The next five years will be an equally important period as the Program moves to implement the integration of Phase IV products with new service delivery models into the Program while implementing new Performance Indicators to track the environmental impact of the Program.

2.0 Performance Measures [Section 5 (1) (a)]

Section 5 (1) (a) of the *Recycling Regulation* allows the Director to adopt performance requirements (other than the default 75% recovery rate) where considered appropriate. In the original stewardship plan approved in December of 2006, the Program identified multiple problems associated with the recovery rate metric as a meaningful performance measure for durable goods such as end-of-life electronics including:

- The lack of knowledge of consumer behaviours surrounding return patterns and product lifespan for obligated electronics products;
- The wide range in estimated product life-spans between product categories;
- The lack of relevance of average sales as a predictor of return volumes;
- The inability to estimate with any accuracy the size of the historic waste pile; and
- The complexities in the electronic supply chain which make the EHF an imperfect approximation of sales and distribution within BC.

In the 2006 Stewardship Plan the Program also committed to undertake a worldwide study of the metrics used in End-Of-Life (EOL) programs after two full years of operational data was available in order to determine which measures would be appropriate for electronic products.

In the summer of 2009 the Program, along with the stewardship programs in Atlantic Canada (ACES), Ontario (OES) and Saskatchewan (SWEEP) commissioned a study to develop a core suite of performance indicators that could be used to allow each program to track its performance over time, facilitate comparisons and benchmarking between jurisdictions and communicate performance accomplishments and targets to government and other stakeholders.

To assist in the selection of a core suite of performance indicators which accomplished these goals the following guiding principles were adopted. All potential performance indicators were screened to determine if they were:

- Representative of performance;
- Easily communicated to and understood by stakeholders;
- Based on data that is feasible to collect, maintain and report with accuracy and ideally verified by third parties;
- Cost effective; and
- Comparable across programs.

Section 4.5.4 of the Intergroup Study Research and Recommendations for *Performance Measures for Regulated, Industry-led, End-of-life Electronics Recycling Programs in Canada* reviewed the recovery/capture rate metric and identified serious analytical problems which arose when this metric was extended to durable goods such as electronics. The report concluded that as a result of these shortcomings the recovery/capture rate was not a meaningful performance measure for durable goods such as electronic products.

As a result the Program asked the Director to approve (as an alternative to the recovery rate) the comprehensive suite of 12 core performance indicators identified in the Intergroup Study. These performance indicators fall into the following five categories: operational indicators; accessibility indicators, awareness indicators; financial indicators and environmental impact indicators. Approval of these indicators as an alternative to the recovery rate was granted by the Director July 9, 2010. The Program has been tracking and reporting on many of these key indicators commencing in 2008, the first full year of operation. A full list of the approved performance indicators and the date that reporting in the Program's Annual Report has or will commence is set out below.

Table 1 - ESABC Performance Indicators

OPERATIONAL INDICATORS	Reporting Commencement Date
Total WEEE Collected (tonnes)	June 30, 2008
Total WEEE Collected Per Capita (tonnes)	June 30, 2009
Total WEEE Collected Per Capita by Regional District (tonnes) ¹	June 30, 2009
ACCESSIBILITY INDICATORS	
Percentage of Population Covered by Collection Sites	June 30, 2010
Total Collection Sites	June 30, 2008
Total Collection Events	June 30, 2009
AWARENESS INDICATORS	
Percentage of the Population aware of the Program	June 30, 2009
FINANCIAL INDICATORS	
Total program Costs per Tonne	June 30, 2009
Operational Costs Per Tonne	June 30, 2009
Overhead costs per Tonne	June 30, 2009
ENVIRONMENTAL IMPACT INDICATORS	
Total Weight of Material Recycled as percentage of Material Collected (by weight)	June 30, 2013
Mass Balancing	June 30, 2013
Trends in Processing	June 30, 2013

In addition, the Program has commissioned a study to identify and examine the channels and destinations of regulated end-of-life electronics that are not collected by the Program and thus currently “unaccountable” to the Program for submission to the MOE in 2011.

2012-2016 Targets

In light of the operational information collected since August 2007, the Program has committed to the following targets for a key suite of three performance indicators for the years 2012-2016. These targets reflect the Program’s commitment to maintain and improve upon the progress achieved to date.

In the 2012-2016 Stewardship Plan, the Program has committed to achieving the following targets for the following three performance indicators which will ensure that the program continues to deliver the best possible service to consumers of the regulated products:

A: Total Volume WEEE Collected

Since the Program commenced operation in August of 2007 totals of program material collected have increased annually by an average of 20% or greater. By December of 2011 the Program will have collected 50,000 metric tonnes of material. This growth rate reflects the Program’s success in establishing and promoting public awareness along with the rollout of comprehensive network of collection sites and events. In the first three and a half years of operation the Program has succeeded in drawing down on the stockpile of historical product. During this timeframe more than 50% of the material collected has been comprised of CRT TVs and computer monitors.

In the next five years the Program anticipates that the amount of historic Phase I and II waste collected will decrease as the stockpile of historic product is depleted. As well it is anticipated that the average weight of Phase I and II products collected in almost all product categories will start to decrease reflecting the trend toward the development of smaller and lighter electronic products. The Program anticipates that the decreases associated with these trends should be offset by an increase in Phase IV materials collected resulting in a relatively steady state in the volume of Phase I and II material collected over the 2012-2016 time frame.

Target 2012-2016: Maintain a three year rolling average of a minimum of 18,000² metric tonnes of program material collected per annum commencing with the year 2011.

Collection targets will be reviewed in 2014 after Phase V volumes are better understood. A summary of that review will be submitted to the Ministry by Q1 of 2015.

¹ This measure will be reported for consumer WEEE collected by the Program at collection sites and via take back events. Phase IV materials collected by new service delivery models such as industry self management will not be included in this number.

² This equates to 4.0 kilograms per capita for ESABC matching the original EU target for all electronics including major product categories not covered by the ESABC program (e.g. large and small appliances).

B: Percentage of the Population with Access to a collection site or event

Target 2012-2016: Maintain the collection network and schedule of collection events to ensure the program achieves 90% coverage on a three year rolling average.

C: Public Awareness: Percentage of the Public Aware of the Program

Target 2012-2016: Continue annual awareness surveys and maintain three year rolling average of 65% awareness of the program commencing with the year 2011 to ensure the program achieves the targeted collection volumes for program materials.

3.0 Program Funding Structure [Section 5 (1) (c) (i)]

The Program is committed to ensuring that the costs of recycling all products collected by the program are shifted from government and taxpayers to the producers and consumers of the products.

With respect to Phase I and II products, the Program is funded by an environmental handling fee (EHF) on members' 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 recycling all regulated products including historic and orphaned waste.

100% of the program revenue is used to cover the costs of administration, collection, transportation and responsible recycling of regulated electronic products. Program revenue and expenditures are audited annually and reported in the ESABC Annual Report which is posted publicly in accordance with the requirements of the *Recycling Regulation*. See www.esabc.ca for a copy of the audited financial statements in the most recent Annual Report.

The Program also maintains two reserves (1) an operating contingency reserve (OCR) to ensure stable operations through variable economic conditions and (2) an effectiveness and efficiency fund to allow the program to invest in continual improvement initiatives.

The EHF are reviewed regularly to ensure they are no more than is necessary to reflect the ongoing costs of operating the program and maintain appropriate reserves. As a result of the first fee review which was conducted in 2009, the EHF for Phase I products was reduced by 20%-70%.

2012-2016

The Program will continue to examine and evaluate current and, where appropriate, other innovative collection models for the delivery of cost effective collection services for Phase I and Phase II Products.

The Program is working with producers to develop new funding models to cover the costs associated with implementing new service delivery models such as industry self management (ISM) for Phase IV products, many of which are already being handled responsibly by industry. Any new funding models will be designed to reflect the principle that the producer and consumer (not the general taxpayer) cover the costs of responsibly recycling products covered by Schedule 3 to the *Recycling Regulation*.

4.0 Consumer Access to Collection Facilities [Section 5 (1) (c) (iii)]

Since commencing operation in 2007, the Program has established a comprehensive network of permanent collection sites where the public can conveniently return electronics for responsible recycling. This network consists of a group of Return-it™ Depots operated by Encorp Pacific, regional government locations, not-for profit organizations and provincial government locations. In 2011 this network had expanded to more than 110 depots providing convenient access to collection sites.

For rural coverage the Program has adopted as a minimum criteria a catchment population of 4000 within a 45 minute driving radius. For urban coverage the Program has adopted as a minimum criteria a catchment population of 150,000 within 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.

In those few rural locations which meet the catchment and driving range criteria for a depot, yet where permanent depots have not yet been located, the Program continues to seek to establish permanent collection sites. In the interim ESABC conducts regular collection events in these areas. Wherever possible, the Program works to coordinate these collection events with other stewards.

Phase IV will cover a wide range of products. While some of the Phase IV products which will be added to the Program in July of 2012 are suitable for incorporation into the existing model (for the collection of Phase I and II products), the majority are products which will require the development of new service delivery models. The Program is working with an industry advisory committee to develop a range of new innovative service delivery models depending on the nature of the product in question. These innovative delivery models will be designed to ensure that Phase IV products are tracked and recycled in accordance with the stringent standards set for Phase I and II products.

5.0 Consumer Awareness [Section 5 (1) (c) (iv)]

Since commencing operation in 2007, the Program has implemented a broad range of marketing initiatives using television, radio, community and daily newspapers, in store advertising, the internet and other media to deliver program information to consumers. As well, ESABC has collaborated with other stewardship agencies to develop common messaging including a recycling handbook.

In first years of operation marketing initiatives have focused on three messages: awareness of collection location; knowledge of materials covered by the Program, and information on responsible recycling.

Annual surveys have been conducted to monitor the effectiveness of these marketing initiatives. These surveys confirm that two thirds of the BC population now know where to take Program product for responsible recycling.

2012-2016

As the Program matures and expands to add a final suite of products, consumer messaging will be refined to become more strategic and targeted to reinforce the existing messaging while addressing emerging issues related to the final phase of program expansion and the emergence of the new stewardship program, while maintaining the current level of consumer awareness. The Program will cooperate and where possible work with other stewards to develop messaging to minimize consumer confusion as the products covered by the *Recycling Regulation* expand to add new product categories and new stewardship programs become operational.

6.0 Management of Program Costs [Section 5 (1) (c) (v)]

The Program has developed a cost effective system to recycle Phase I and II products in accordance with the requirements of the Electronics Product Stewardship Canada (EPSC) recycler qualification program (RQP) as updated from time to time. The Board of ESABC annually undertakes a comprehensive strategic review of the program and develops a business plan to ensure that the program delivers the highest quality product at the lowest possible cost. See the most recent business plan posted on the Program website at www.esabc.ca.

2012-2016

The Program's financial statements are audited annually and published on its website as part of its Annual Report. The Program also includes reporting on key financial performance indicators, total costs per tonne, overhead costs per tonne and operational costs per tonne in its annual report. The Program also provides additional detail on annual program expenses reporting annually on costs incurred for collection,

transportation and storage, processing, administration, consumer awareness and education, and research and development.

As well, the Program's non financial information (e.g. number of collection sites; number of tonnes collected and tonnes recycled) was reviewed by a Chartered Accounting firm for 2010 and will be reviewed annually on an ongoing basis.

7.0 Management of Environmental Impacts [Section 5 (c) (v)]

The Program, in conjunction with its sister programs ACES, OES & SWEEP, has committed to reporting on a comprehensive suite of three performance indicators to track the environmental impact of the program:

1. *Total weight of material recycled as a percentage of material collected.* This indicator will track the amount of material ultimately diverted from the waste stream and recycled.
2. *Mass Balancing.* This indicator will track the flow of materials through the entire recycling stream.
3. *Trends in Processing.* This indicator will highlight recycling developments which may result in higher material recovery

2012 – 2016

The Program is developing the protocols to collect the data necessary to commence reporting on these environmental impact performance indicators for the operational year 2012.

8.0 Dispute Resolution [Section 5 (1) (c) (vi)]

The Program has incorporated normal commercial dispute resolution provisions into contracts with third parties. The Program works cooperatively with other stewards on collective program initiatives including supporting the RCBC hotline and developing a common recycling handbook.

Any queries respecting the operation of the program from consumers or other stakeholders are responded to promptly by the appropriate member of the Program's operations team. Issues which remain unresolved after this initial response are referred to the Board of Directors.

2012-2016

As new stewardship programs are developed to address products covered by Schedule 3 to the Recycling Regulation, the Program recognizes that issues may arise which require action to ensure that each program collects and pays the cost of recycling their program product. In the event that such issues arise, the Program commits to working with the programs in question to develop equitable, reasonable, cost effective protocols and procedures to address the issues of mutual concern.

9.0 Product Life Cycle Management [Section 5 (1) (c) (vii)]

Over the last 20 years, environmental design initiatives being undertaken by member producers have resulted in improvements on the environmental impact of electronic products. The benefits of these design innovations are felt throughout industry at each stage of a product's life cycle. ESABC incorporates the information on these initiatives as set out in the EPSC Design for the Environment Report (www.EPSC.ca) and reports annually on these initiatives.

As a performance measure, the Program has also adopted trends in processing which reflects the program's ability to influence processing in a positive manner. Long term trends in processing which are dependent on product design will be examined and reported commencing with the operational year 2012.

2012-2016

The Program will commence reporting in 2013 on trends in processing.

10.0 Management in Accordance with the Pollution Prevention Hierarchy [Section 5 (1) (c) (viii)]

The Program manages end of life product collected in accordance with the pollution prevention hierarchy (recycle, recover, residual disposal). Recycling of electronics involves processing to maximize the recovery of raw materials such as metals, glass and plastics. The Program reports annually on the recycling processes used to recover materials which are used in the manufacture of new products (www.esabc.ca) and will commence mass balancing reporting commencing with the operational year 2012.

In addition the Program has implemented a number of measures to promote reuse as a alternative to recycling where appropriate. The Program encourages consumers through its website to determine whether or not reuse is a viable option for their electronic products before taking them to a collection site for recycling. To further promote reuse, the Program has partnered with the Recycling Council of British Columbia (RCBC) to develop a specialized material exchange for electronics. The British Columbia Materials Exchange (BCMEX) is designed for individuals who want to donate or sell small quantities of electronics at a nominal cost: www.bcemex.ca.

To ensure responsible recycling the Program has adopted the EPSC RQP standard which ensures a high level of environmental health and safety standards. As well, this standard ensures that socially responsible practices are met by Program approved recyclers. In 2010 the Program developed and adopted an electronics reuse and refurbishment standard (ERRP) which matches the EPSC recycling standard.

The ESABC Electronics Reuse and Refurbishing Program (ERRP) is designed to foster responsible environmental, safety and social management practices related to the reuse and refurbishing of electronics, providing donors with a level of assurance that products reused through an organization recognized under this program are handled in a responsible manner, thus facilitating the extended use of electronic products before their disposition into an end-of-life recycling program.

The ERRP aims to maximize the amount of materials available for reuse and further ensure that materials entering the reuse stream are utilized to the greatest extent possible. It is also recognized that it is the right of the owner/donor of the electronic equipment to ultimately choose the end destination for this equipment.

The ERRP is governed by six key principles:

1. **Donor's choice** – The owner/donor of the electronic equipment has the right to choose what will be done with the equipment. The donor will designate if the equipment can be considered for reuse and refurbishing or if it will go directly to be recycled. The donor has the right to know that equipment and materials handled by an organization recognized under the ERRP are processed in an environmentally and socially responsible manner. The donor also has the right to request suitable evidence from the Reuse organization that all data from equipment destined for reuse or refurbishing is destroyed before going to a future use.
2. **Approved Organizations** – Reuse/Refurbishing organizations seeking to be recognized by the Stewardship Program will be audited and approved in accordance with the requirements of the Electronics Reuse and Refurbishing Standard (ERRS) prior to consideration.
3. **Destination of Equipment** – Equipment that has been selected for reuse or refurbishing through this Program will be sourced from and designated for use within the Province.
4. **Management of Designated Products** – Reuse/Refurbishing organizations will have adequate tracking systems in place to prevent crossover of material between other streams or supply sources within their operation.
5. **Non-useable Electronic Equipment and Materials** – Non-useable equipment and materials generated by the Reuse/Refurbishing organization will be responsibly recycled through a Recycler approved by the Stewardship Program.
6. **Recipient's Rights and Responsibility** – Those receiving material from an organization approved under the ERRP will be protected by the Reuse/Refurbishing organization's product warranty. When the equipment is no longer functional, it will be the recipient's responsibly to have it returned to the Stewardship Program for recycling.

The Program also provides support to reuse organizations by picking up and transporting their end of life material for responsible recycling at no cost.

2012-2016

The Program will encourage responsible reuse by endorsing reuse organizations which are successfully audited to the ERRP standard.

11.0 Stakeholder Consultation [Section 5 (1) (b)]

The original Stewardship Plan was the subject of broad stakeholder consultation prior to implementation. Further comprehensive public and industry consultation took place in the spring and summer of 2009 with respect to the expansion of the Program to include Phase II products in 2010.

For the first time ever, stakeholders were invited to attend joint public consultation meetings for the review of four BC product stewardship plans: Tire Stewardship BC, the Electronic Stewardship Association of BC, Product Care Association and the Post-Consumer Pharmaceutical Stewardship Association.

The joint consultation sessions were held as follow:

- Prince George - Wednesday May 25, 2011 – Ramada Inn
- Kelowna - Friday May 27, 2011 – Coast Capri Hotel
- Nanaimo - Monday May 30, 2011 – Coast Bastion Inn
- New Westminster - Tuesday May 31, 2011 – Inn at the Quay

People could register online at <http://bcstewardconsultations.ca/> and could download a copy of the product stewardship plans from each agency's website. ESABC's stewardship plan was posted and available for public comment and the deadline for submission of written comments on ESABC's plan was July 8, 2011.

Advance notifications were sent out on April 18th to 329 common stakeholders such as senior government, stewardship associations, ENGOs including RCBC, regional districts and municipalities. An electronic notice was also sent to ESABC's registered members, processors, depot operators and transporters on May 24th. Finally, the draft plan was shared with ESABC's Phase IV Industry Committee and more than fifteen of the leading electronics industry associations across North America.

A total of 84 individuals participated in the four consultation sessions and eight written submissions were received by July 8, 2011. In addition, ESABC consulted with their Local Advisory Committee separately from the public and their input was considered when the plan was drafted.

ESABC's presentation at the consultation sessions provided an overview of the Plan as well as opportunities to ask questions and provide feedback. Appendix C includes a summary of the questions and comments received through the consultation process and ESABC's responses to that feedback. The questions and comments received have been reviewed and considered and our responses provide greater clarification about how the program will operate.

Below are quotes from two of the written submissions which are also reflective of the positive tone of the discussions at many of the consultation sessions:

"The Program has been highly effective at collecting and managing scrap electronics in BC, through several phases and product categories. The Program should also be commended for two initiatives:

1. *Development of product reuse standards to ultimately help consumers make informed decisions regarding their unwanted electronics, and moving up the pollution prevention hierarchy from recycling to reuse.*
2. *Publishing a detailed breakdown of the ultimate disposition (e.g., recycling, energy recovery, or residual disposal) of the materials collected by the program in its Annual Report"*

"Overall, this is a positive plan. We especially support the commitments to:

- *Ensure that the costs of recycling all products collected by the program are shifted from government and taxpayers to the producers and consumers of the products*
- *Expand the program to the extensive list of products in Appendix B of your plan (Phase IV products in the Recycling Regulation, with program launch in 2012)*
- *Establish an Electronics Reuse and Refurbishing Program and endorse organizations that meet this standard, which will help reassure the public that products they donate to these organization for reuse are handled in a responsible manner*
- *Abide by the guiding principles set out in your plan, including not cross-subsidizing between product categories*
- *Continue to use a broad range of tools to market the program, and cooperate with other stewards to develop messages related to collecting Phase IV electronics"*

ESABC felt that the comments and questions were consistently constructive and in the spirit of collaborating towards a better overall program.

Appendix C provides a summary of the questions and comments received and where possible, like comments have been grouped together for ease of response. We have distilling four hours of discussion and eight written comments into the following table. In doing so, we have tried to maintain the essence of the public's input without distortion.

Appendix A

Phase I –

Obligated as of: August 1, 2007

PROGRAM PRODUCT LIST – PHASE I & II

OBLIGATED PRODUCTS	PRODUCT DEFINITION	PRODUCTS INCLUDED IN THE OBLIGATED CATEGORY	PRODUCT NOT INCLUDED IN THE OBLIGATED CATEGORY
Desktop Computers	<p>A computer terminal designed to reside on a desk or similar work surface</p> <p>May be packaged with a mouse, keyboard, cables, speakers, webcam and other peripherals in a single Original Equipment Manufacturer (OEM) package carrying a single SKU, subject to a single desktop computer EHF.</p> <p>Includes desktop computers and desktop computers acting as servers.</p>	<p>Standalone:</p> <ul style="list-style-type: none"> • Computer terminal • Desktop computer used as a server • Thin client 	<ul style="list-style-type: none"> • Non-standalone computer terminal that is embedded into a non-regulated product • Rack mounted and floor-standing server • Uninterruptible Power Supply (UPS) • Cash registers / POS terminals
Portable Computers	<p>A personal computer designed for portable use</p>	<ul style="list-style-type: none"> • Laptop computer • Notebook computer • Tablet computer • Netbook computer 	<ul style="list-style-type: none"> • PDA (non-cellular enabled) – SEE PERSONAL/PORTABLE category: PRODUCTS INCLUDED • Calculator • Other handheld computing devices
Display Devices	<p>A non-portable video display device that typically resides on a table, floor or wall and requires AC power to operate</p> <p>May contain an imbedded television tuner, or may be used for displaying images from computers or other digital or analog sources such as an external TV tuner or cable/satellite receiver.</p> <p>Includes various display technologies, such as CRT, flat panel (LCD, Plasma, LED, OLED, etc.) or rear projection.</p>	<p>Standalone:</p> <ul style="list-style-type: none"> • Television • Computer monitor • Professional display • Closed circuit monitor screen 	<ul style="list-style-type: none"> • Non-standalone displays that are embedded into a non-regulated product • Digital photo frames – SEE HOME A/V category: PRODUCTS INCLUDED • POS Pole Display • Refrigerator with built in TV • Electronic whiteboards • 3D Glasses
Desktop Printers and Fax Machines	<p>A printing or facsimile device designed to reside on a desktop or similar work surface</p> <p>May be a “multi-function” or “all in one” device that performs different tasks such as copy, scan, fax, print, etc., in which case the integrated product is subject to a single EHF.</p> <p>Includes various printing technologies, such as Laser & LED (electrophotographic), ink jet, dot matrix, thermal, dye sublimation, etc.</p>	<p>Standalone:</p> <ul style="list-style-type: none"> • Desktop printers • Camera dock printers • Desktop label, barcode, card printers • Desktop fax machines 	<ul style="list-style-type: none"> • Floor standing printers • Point of sale (POS) receipt printers • Handheld printers such as calculators with printing capability or label-makers • Non-standalone printers that are embedded into non-regulated products
Computer Peripherals	<p>A manual input keying or pointing device, such as a mouse, a keyboard, or a similar device, designed for use with a desktop or portable computer.</p> <p>Includes both wired and wireless devices.</p>	<ul style="list-style-type: none"> • Mouse • Trackball • Keyboard • Keypad • Touchpad Mouse 	<ul style="list-style-type: none"> • Joysticks and other game controllers • Graphic tablets • Stylus • Magnetic stripe readers • Modems, Hubs, Switches and Routers • Mobile internet sticks

Phase II –
Obligated as of: July 1, 2010

PROGRAM PRODUCT LIST – PHASE I & II

OBLIGATED PRODUCTS	PRODUCT DEFINITION	PRODUCTS INCLUDED IN THE OBLIGATED CATEGORY	PRODUCT NOT INCLUDED IN THE OBLIGATED CATEGORY
<p>Desktop Computers Scanners</p>	<p>Desktop imaging equipment designed for use in conjunction with a personal computer or network system that converts hard copy data such as text, photos, etc., into an electronic file</p>	<ul style="list-style-type: none"> • Desktop computer scanners • Desktop Business card scanners • Desktop Cheque scanners • Desktop Photo negative scanner 	<ul style="list-style-type: none"> • Floor standing drum scanners • MRI equipment • Barcode scanners • Cables or other accessories
<p>Personal Portable Audio/Video Playback and/or Recording Systems</p>	<p>A portable device used primarily for personal use, that operates on battery power or is powered directly from the device it is connected to (i.e. computer), including:</p> <ul style="list-style-type: none"> • Clock radios • Computer/docking speakers • Compact/folding speakers • Portable stereos/ tape players/ radios • Personal CD players • Portable audio recorders • Headphones • Computer / phone and/or voice recorder microphones • MP3 players • Voice recorders • Analog and digital cameras and video cameras/ camcorders • Non-cellular enabled PDAs • Portable scanners (*Not obligated in SK) • Portable printers • Webcams • Digital frames • Portable displays 	<ul style="list-style-type: none"> • Portable AM/FM radios • Clock radios • Portable stereos • Portable tape players/ recorders • Portable Disc (CD, DVD, Blu-ray, etc.) players/ recorders • MP3 players • Portable docking/compact speakers (wired and wireless including Wi-Fi or Bluetooth) • Portable cassette or digital audio/voice recorders • Headphones • Mini earphones and microphones • Headsets (wired and wireless, including Bluetooth) • Microphones for use with an obligated product • Digital and non-digital cameras • Digital photo key chains • Video cameras/ camcorders • Personal Digital Assistants (PDAs) which are not enabled to connect to cellular networks • Multi-function satellite radios that include CD, MP3, FM radio or other audio functions. • Portable scanners (Business card scanners; Photo negative scanners) (* Not obligated in SK, therefore no EHF applies in the SWEEP Program) • Portable printers • Web cameras • Digital frames • Portable displays – screen size less than 10" • Baby video monitor and camera systems 	<ul style="list-style-type: none"> • Single-use or one-time use cameras • Children’s toy cameras • Discs (CDs, DVDs, Blu-ray, HDDVD, etc.) • Commercial, Professional or industrial video cameras and/or microphones • Industrial/commercial quality microphones used for musical recording, performances and/or public address • Cables or other accessories • Cellular-enabled PDAs • Industrial or commercial handheld or mobile computing devices • Global Positioning System (GPS) receivers and components • Satellite radio receivers and components (used exclusively for satellite audio) • E-readers / electronic Books • Electronic Dictionaries • Calculators • Handheld printers such as calculators with printing capability or label-makers • 3D Glasses • Two-way radios (walkie-talkies) • Personal FM transmitters

Phase II –

Obligated as of: July 1, 2010

OBLIGATED PRODUCTS	PRODUCT DEFINITION	PRODUCTS INCLUDED IN THE OBLIGATED CATEGORY	PRODUCT NOT INCLUDED IN THE OBLIGATED CATEGORY
Home Audio/ Video Playback and/or Recording Systems	<p>Audio and video playback and/or recording systems (mini/mid/full size) or system components for residential use but may also be used for institutional, commercial or industrial applications, including:</p> <p>Audio equipment:</p> <ul style="list-style-type: none"> • Amplifiers • Receivers • Speakers • CD players (single and multi-disc units) • Radios • Turntables • Cassette and other tape players <p>Video equipment:</p> <ul style="list-style-type: none"> • Data/multi-media projectors • VCRs • DVRs • PVRs • DVD players • Blu-ray players • Laser Disc players • Security cameras <p>Cable and Satellite TV Equipment</p>	<ul style="list-style-type: none"> • AM/FM Radios • Video Cassette Recorders (VCRs) • Digital Video Recorders (DVRs) • Personal Video Recorders (PVRs) • Disc players/ recorders (DVD, Blu-ray, etc.) • Laser Disc players/ recorders • Cable & satellite receivers • Set-top boxes Including digital TV <p>Home stereo systems or components, including:</p> <ul style="list-style-type: none"> • Amplifiers • Receivers • CD or tape decks • Turntables/record players • Home speaker systems such as 5.1 and 7.1 speaker packages supplied without amplifier or video player, including computer (multi-media) speakers • Other digital music recorders/players • Audio docking stations • Analog & digital video cameras for home security or other closed circuit home use 	<ul style="list-style-type: none"> • Industrial/commercial quality amplifiers, speakers and related equipment used for musical recording, performances and/or public address • Video gaming equipment, including those that can also play DVDs, etc. • Satellite dishes • Cables or other accessories • Karaoke machines • Alarm clocks and wall clocks • Audio baby monitors and receivers • Intercoms • 3D Glasses • Overhead projectors • Web cameras – SEE PERSONAL/PORTABLE A/V category: PRODUCTS INCLUDED • Digital Frames – SEE PERSONAL/PORTABLE A/V category: PRODUCTS INCLUDED • Clock radios – SEE PERSONAL/PORTABLE A/V category: PRODUCTS INCLUDED
Home Theatre in a Box (HTB) Systems	<p>Audio and/or video equipment packaged by an OEM as a complete system intended to provide an “in-home” theatre experience.</p>	<ul style="list-style-type: none"> • HTB audio and video equipment packaged as a complete unit, including: amplifiers, disc players, speakers, sub-woofers and all associated cables, etc. 	<ul style="list-style-type: none"> • Home speaker systems – SEE HOME A/V category: PRODUCTS INCLUDED
Vehicle Audio & Video Systems	<p>Aftermarket audio and/or video systems or system components intended to replace or supplement OEM factory-installed systems or system components.</p>	<p>Aftermarket vehicle audio & video components, including:</p> <ul style="list-style-type: none"> • In-dash radio, DVD, CD and/or cassette players (including those with integrated satellite radio and/or GPS/navigation functions) • Amplifiers • Equalizers • Speakers • Video player systems • Video displays (including those with built-in tuners) 	<ul style="list-style-type: none"> • Factory-installed audio and video equipment developed for imbedded use in motor vehicles of any type (includes marine-craft radios and intercom systems) • Standalone or in-dash navigation systems (e.g. GPS receivers and components) that are not integrated with other A/V components • Satellite radio receivers and components • Back-up camera systems • Related cables or other accessories

Phase II –

Obligated as of: July 1, 2010

OBLIGATED PRODUCTS	PRODUCT DEFINITION	PRODUCTS INCLUDED IN THE OBLIGATED CATEGORY	PRODUCT NOT INCLUDED IN THE OBLIGATED CATEGORY
<p>Non-Cellular Telephone and Answering Machines</p>	<p>A telecommunication device with a handset, multiple handsets or microphone and speaker systems that is used to transmit and receive sound (most commonly speech).</p> <p>A device that is designed to record sound from incoming calls over a telephone line or VOIP line.</p>	<ul style="list-style-type: none"> • Telephones (corded and cordless, VoIP, satellite phones) • Telephone line answering machines (cassette and digital) • Speaker/Conference Phone 	<ul style="list-style-type: none"> • Telecommunications equipment developed for imbedded use in motor vehicles of any type • Two-way radios (walkie-talkies) • Commercial-grade "pay phones" • Audio baby monitors and receivers • Fax machines – SEE PRINTERS category: PRODUCTS INCLUDED

Notes:

1. The list of Product Definitions and Clarifications may be revised periodically by the Program.

Appendix B

PROGRAM PHASES I, II & IV – Projected Product List for July 2012

BC RECYCLING REGULATION SCHEDULE 3 WORDING	PROGRAM PRODUCT DEFINITION	SAMPLES OF OBLIGATED PRODUCTS INCLUDED
<p>2 (1) (a): computers that are designed: (i) for desktop use by an individual, (ii) for desktop use as a server (note: The electronic and electrical product category does not include computers and televisions that are part of or attached to vehicles, marine vessels or commercial or industrial equipment)</p>	<p>A computer terminal designed to reside on a desk or similar work surface.</p> <p>May be packaged with a mouse, keyboard, cables, speakers, webcam and other peripherals in a single Original Equipment Manufacturer (OEM) package carrying a single SKU, subject to a single desktop computer EHF.</p> <p>Includes desktop computers and desktop computers acting as servers.</p>	<p>Standalone:</p> <ul style="list-style-type: none"> • Computer terminal • Desktop computer used as a server • Desktop servers • Thin client • Electronic Typewriters • Telex Machines • Cash registers / POS terminals, including POS pole displays
<p>2 (1) (a): computers that are designed: (iii) to be portable, except hand-held devices; (note: The electronic and electrical product category does not include computers and televisions that are part of or attached to vehicles, marine vessels or commercial or industrial equipment)</p>	<p>A personal computer designed for portable use.</p>	<ul style="list-style-type: none"> • Laptop computer • Notebook computer • Tablet computer • Netbook computer
<p>2 (1) (c): televisions (note: “computer” includes a computer <u>monitor</u> and computer peripheral) (note: The electronic and electrical product category does not include computers and televisions that are part of or attached to vehicles, marine vessels or commercial or industrial equipment)</p>	<p>A non-portable video display device that typically resides on a table, floor or wall and requires AC power to operate.</p> <p>May contain an imbedded television tuner, or may be used for displaying images from computers or other digital or analog sources such as an external TV tuner or cable/satellite receiver.</p> <p>Includes various display technologies, such as CRT, flat panel (LCD, Plasma, LED, OLED, etc.) or rear projection.</p>	<p>Standalone:</p> <ul style="list-style-type: none"> • Television • Computer monitor • Professional display • Closed circuit monitor screen
<p>2 (1) (b): desktop printers (note: “desktop printer” means a printer that will print on paper not exceeding 8.5 inches in width but does not include a label printer)</p>	<p>A printing or facsimile device designed to reside on a desktop or similar work surface.</p> <p>May be a “multi-function” or “all in one” device that performs different tasks such as copy, scan, fax, print, etc., in which case the integrated product is subject to a single EHF.</p> <p>Fax machines packaged with cordless telephone handsets in a single OEM packaged under a single SKU are subject to one EHF.</p> <p>Includes various printing technologies, such as Laser & LED (electrophotographic), ink jet, dot matrix, thermal, dye sublimation, etc.</p>	<p>Standalone:</p> <ul style="list-style-type: none"> • Desktop printers • Camera dock printers • Desktop label, barcode, card printers • Desktop fax machines • Point of sale (POS) receipt printers
<p>COMPUTER PERIPHERALS (note: computer “peripheral” means a keyboard, mouse or cable that attaches or is attached to a computer)</p>	<p>A manual input keying or pointing device, such as a mouse, a keyboard, or a similar device, designed for use with a desktop or portable computer.</p> <p>Includes both wired and wireless devices.</p> <p>A combination of a single mouse and a single keyboard packaged in a one OEM box under a single SKU is subject to one EHF.</p>	<ul style="list-style-type: none"> • Mouse • Trackball • Keyboard • Keypad • Touchpad Mouse • Joysticks and other game controllers • Graphic tablets • Magnetic stripe readers • Ergonomic and other enhanced accessibility input devices • Foot pedal computer controller

BC RECYCLING REGULATION SCHEDULE 3 WORDING	PROGRAM PRODUCT DEFINITION	SAMPLES OF OBLIGATED PRODUCTS INCLUDED
<p>2.1 (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;</p>	<p>PERSONAL / PORTABLE AUDIO/VIDEO PLAYBACK AND/OR RECORDING SYSTEMS: A portable device used primarily for personal use, that operates on battery power or is powered directly from the device it is connected to (i.e. computer), including:</p> <ul style="list-style-type: none"> • Clock radios • Computer/docking speakers • Compact/folding speakers • Portable stereos/ tape players/ radios • Personal CD players • Portable audio recorders • Headphones • Computer / phone and/or voice recorder microphones • MP3 players • Voice recorders • Analog and digital cameras and video cameras/ camcorders • Non-cellular enabled PDAs • Portable scanners (*Not obligated in SK) • Portable printers • Webcams • Digital frames • Portable displays 	<ul style="list-style-type: none"> • Portable AM/FM radios • Clock radios • Portable stereos • Portable tape players/recorders • Portable Disc (CD, DVD, Blu-ray, etc.) players/ recorders • MP3 players • Portable docking/compact speakers (wired and wireless including Wi-Fi or Bluetooth) • Portable cassette or digital audio/ voice recorders • Headphones • Mini earphones and microphones • Headsets (wired and wireless, including Bluetooth) • Microphones for use with an obligated product • Digital and non-digital cameras, including lenses and flashes • Digital photo key chains • Single-use cameras • Video cameras/ camcorders • Personal Digital Assistants (PDAs) which are not enabled to connect to cellular networks • Portable scanners (business card scanners; photo negative scanners) • Portable printers • Web cameras • Digital frames • Portable displays – screen size less than 10" • Baby monitor systems (audio & video) • Electronic calculators • AV cables and accessories • Global Positioning System (GPS) receivers and components • Satellite radio receivers and components • E-readers / electronic books • Electronic dictionaries • Two-way radios/FRS/walkie talkies • Personal FM transmitters • Hand-held video gaming equipment and related accessories • Other handheld computing devices • Industrial or commercial handheld or mobile computing devices • Handheld printers such as calculators with printing capability or label-makers

BC RECYCLING REGULATION SCHEDULE 3 WORDING	PROGRAM PRODUCT DEFINITION	SAMPLES OF OBLIGATED PRODUCTS INCLUDED
<p>2.1 (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</p>	<p>HOME AUDIO/ VIDEO PLAYBACK AND/OR RECORDING SYSTEMS:</p> <p>Audio and video playback and/or recording systems (mini/mid/full size) or system components for residential use but may also be used for institutional, commercial or industrial applications, including:</p> <p>Audio equipment:</p> <ul style="list-style-type: none"> • Amplifiers • Receivers • Speakers • CD players (single and multi-disc units) • Radios • Turntables • Cassette and other tape players <p>Video equipment:</p> <ul style="list-style-type: none"> • Data/multi-media projectors • VCRs • DVRs • PVRs • DVD players • Blu-ray players • Laser Disc players • Security cameras <p>Cable and Satellite TV Equipment</p>	<ul style="list-style-type: none"> • AM/FM Radios • Video Cassette Recorders (VCRs) • Digital Video Recorders (DVRs) • Personal Video Recorders (PVRs) • Disc players/ recorders (DVD, Blu-ray, etc.) • Laser Disc players/recorders • Cable & satellite receivers • Set-top boxes Including digital TV • Multimedia players/recorders • Data/multi-media projectors <p>Home stereo systems or components, including:</p> <ul style="list-style-type: none"> • Amplifiers • Receivers • CD or tape decks • Turntables/record players • Home speaker systems such as 5.1 and 7.1 speaker packages supplied without amplifier or video player, including computer (multi-media) speakers • Other digital music recorders/ players • Audio docking stations • Analog & digital video cameras for home security or other closed circuit home use • Satellite dishes • Cables or other accessories (3D Glasses, etc) • Karaoke machines • Overhead projectors • Intercoms • Home/non-commercial video gaming equipment consoles and related accessories
<p>2.1 (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</p>	<p>HOME THEATRE IN A BOX (HTB) SYSTEMS:</p> <p>Audio and/or video equipment packaged by an OEM as a complete system intended to provide an “in-home” theatre experience.</p>	<ul style="list-style-type: none"> • HTB audio and video equipment packaged as a complete unit, including: amplifiers, disc players, speakers, sub-woofers and all associated cables, etc.

BC RECYCLING REGULATION SCHEDULE 3 WORDING	PROGRAM PRODUCT DEFINITION	SAMPLES OF OBLIGATED PRODUCTS INCLUDED
<p>2.1 (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 (note: The electronic and electrical product category does not include computers and televisions that are part of or attached to vehicles, marine vessels or commercial or industrial equipment)</p>	<p>VEHICLE AUDIO & VIDEO SYSTEMS:</p> <p>Aftermarket audio and/or video systems or system components intended to replace or supplement OEM factory-installed systems or system components.</p> <p>Multiple speakers supplied in a single OEM package and sold under a single SKU are subject to one EHF.</p>	<p>Aftermarket vehicle audio & video components, including:</p> <ul style="list-style-type: none"> • In-dash radio, DVD, CD and/or cassette players (including those with integrated satellite radio and/or GPS/navigation functions) • Amplifiers • Equalizers • Speakers • Video player systems • Video displays (including those with built-in tuners) • Standalone GPS or other navigation systems • Satellite radio receivers and components • Back-up camera systems • Collision avoidance systems • Car starters • Car security systems • Radar detectors • Related cables and other accessories
<p>2.1 (a)(i) scanners (note: if for desktop or portable use)</p>	<p>DESKTOP COMPUTER SCANNERS:</p> <p>Desktop imaging equipment designed for use in conjunction with a personal computer or network system that converts hard copy data such as text, photos, etc., into an electronic file</p>	<ul style="list-style-type: none"> • Desktop computer scanners • Desktop business card • Desktop cheque scanners • Desktop photo negative • Scanner • Related cables or other accessories
<p>2.1 (b) telephones and telephone answering systems</p>	<p>NON-CELLULAR TELEPHONES AND ANSWERING MACHINES:</p> <p>A telecommunication device with a handset, multiple handsets or microphone and speaker systems that is used to transmit and receive sound (most commonly speech).</p> <p>A device that is designed to record sound from incoming calls over a telephone line or VOIP line.</p> <p>Accessory handsets packaged with a telephone in a single OEM package under a single SKU are subject to one EHF.</p> <p>Accessory speakers/microphones packaged with a speaker/conference phone in a single OEM package under a single SKU are subject to one EHF.</p>	<ul style="list-style-type: none"> • Telephones (corded and cordless, VoIP, satellite phones) • Telephone line answering machines (cassette and digital) • Speaker/conference phone
<p>2.3 (b)(vii): bar code and point-of-sale scanners (note: except for large-scale industrial devices)</p>	<p>TBD</p>	<ul style="list-style-type: none"> • Hand-held bar code scanners • Stationary bar code scanners • Kiosks for use in Retail, Travel, Hospitality, Entertainment, and other Commercial Applications

BC RECYCLING REGULATION SCHEDULE 3 WORDING	PROGRAM PRODUCT DEFINITION	SAMPLES OF OBLIGATED PRODUCTS INCLUDED
<p>2.3 (d): electronic or electrical medical devices or equipment for detecting, preventing, monitoring, treating or alleviating illness, injury or disability, (note: except for devices that have been implanted in a person or have been exposed to infectious matter)</p>	TBD	<ul style="list-style-type: none"> • Radiotherapy equipment • Cardiology equipment • Dialysis equipment • Pulmonary ventilators • Nuclear medicine equipment • Laboratory equipment for IVD • Analyzers • Fertilization tests • Other medical equipment (hearing aids, nebulizers, blood pressure monitors, medical thermometers) • MRI equipment
<p>2.3 (f): electronic or electrical information technology or telecommunication devices, equipment or media, including:</p> <p>(i) typewriters</p>	TBD	<ul style="list-style-type: none"> • Electronic Typewriters • Teleprinters, TTY machines, Telex machines
<p>2.3 (f): electronic or electrical information technology or telecommunication devices, equipment or media, including:</p> <p>(ii) pocket & desk calculators</p>	TBD	<ul style="list-style-type: none"> • Electronic calculators
<p>2.3 (f): electronic or electrical information technology or telecommunication devices, equipment or media, including:</p> <p>(iii) printers, scanners, fax machines, and copying equipment</p>	TBD	<p>Large format imaging devices (including multi-function devices which print, scan, copy, fax):</p> <ul style="list-style-type: none"> • Floor standing printers • Floor standing scanners • Floor standing fax machines • Floor standing photocopiers • Floor standing drum scanners
<p>2.3 (f): electronic or electrical information technology or telecommunication devices, equipment or media, including:</p> <p>(iv) network and telecommunication equipment</p>	TBD	<p>Commercial or professional telecommunications equipment, including:</p> <ul style="list-style-type: none"> • Microwave terminals • Optical/Digital terminals • Routers/Softswitches • Digital (TDM) switches • Radio base stations • Other related telecomm server equipment <p>Floor standing & rack-type servers</p> <p>Modems, hubs, switches and routers</p> <p>Two-way radios, FRS, Walkie Talkies</p> <p>Personal FM transmitters</p>
<p>2.3 (f): electronic or electrical information technology or telecommunication devices, equipment or media, including:</p> <p>(v) devices, equipment or media for collecting, storing, processing, presenting or communicating information, including, without limitation, sounds and images</p>	TBD	<p>GPS Units - portable and after-market vehicle installation</p> <p>External computer hard drives</p> <p>(eBooks) Electronic book readers</p> <p>Electronic whiteboards</p> <p>Commercial, professional or industrial video cameras and/or microphones</p> <p>Industrial/commercial quality microphones used for musical recording, performances and/or public address</p> <p>Industrial/commercial quality amplifiers, speakers and related equipment used for musical recording, performances and/or public address</p> <p>After-market vehicle-based systems, including collision avoidance, car starters, car security, radar detection, etc.</p>

BC RECYCLING REGULATION SCHEDULE 3 WORDING	PROGRAM PRODUCT DEFINITION	SAMPLES OF OBLIGATED PRODUCTS INCLUDED
2.3 (f): electronic or electrical information technology or telecommunication devices, equipment or media, including: (vi) telex machines	TBD	Teleprinters, TTY machines, Telex machines
2.3 (f): electronic or electrical information technology or telecommunication devices, equipment or media, including: (vii) computer terminals or systems	TBD	Text terminal, dumb terminal, text console, graphical terminals
2.3 (g) ... video games and video gaming equipment and consoles...	TBD	Home/non-commercial video gaming equipment and gaming accessories - both consoles and handhelds
2.3 (h) electronic or electrical monitoring and control instruments, including, without limitation, alarm systems, heating regulators and appliances for measuring, weighing or adjusting	TBD	<p>Specialized scientific and technical monitoring and control instruments and related cables & accessories:</p> <ul style="list-style-type: none"> • Atomic spectroscopy • Bioanalyzer • Dissolution sampling station • Capillary electrophoresis • Gas chromatograph • Leak detection equipment • Liquid chromatograph • Magnetic resonance • Mass spectrometry • Molecular spectroscopy • PCR & QPCR • Vacuum technologies • Bench-top analyzers (oscilloscopes, spectrum, network, logic, protocol, counter, generators, sources, supplies, etc.) • Hand-held analyzers and meters (multi-meters, optical testing, data acquisition, thermal & Infrared equipment, etc.) • Sensors • PXI vector signal analyzer • Modular products and systems • Atomic force microscopes • FE-SEM • Nanoindenters • Static testing equipment • Ray crystallography
2.3 (i) ... media for recording, reproducing or distributing sound or images...	TBD	<p>Both recorded and blank:</p> <ul style="list-style-type: none"> • CDs, DVDs • VHS, Beta and all other video tapes • Cassette tapes • LPs • Laser discs • Digital media (USB memory sticks, SDHC, etc.)
2.3 (j) accessories for use with any products referred to in this schedule, including cables, adapters, connection cords and chargers	TBD	<p>All Phase I, II & IV related accessories including:</p> <ul style="list-style-type: none"> • Cables • Adaptors • Connection cords • Chargers • Uninterruptible Power Supply (UPS) • 3D glasses for obligated display devices
2.3 (k) batteries for use in an electronic or electrical product referred to in this section, including primary and rechargeable batteries	TBD	<ul style="list-style-type: none"> • Batteries contained in ESABC Phase I, II or IV products returned for recycling.

- Notes:**
1. Further detailed descriptions of Products included in Program Phase IV categories are under development.
 2. Additional or expanded descriptions of eligible products and adjustment of all program product categories will be developed as technological change requires while adhering to all program principles.
 3. The list of Product Definitions and Clarifications may be revised periodically by the Program.

Appendix C

STAKEHOLDER CONSULTATION SUMMARY

ABANDON ELECTRONICS COMMENT/QUESTIONS	RESPONSE
As noted in the following bullet, program materials are leaking out of the collection network through illegal dumping, and by consumers putting electronic waste into the garbage. While the causes of this behaviour are not yet known, we recommend that ESABC review their criteria for establishing depots to see if modifications are needed to capture the material currently leaking out of the collection network.	See comment below
We recommend that ESABC commit to joining other product stewardship programs to work with local government to: a. research the composition and root causes of abandoned waste, including electronics; b. based on the results of the research, discuss possible solutions; and c. develop performance measures and report annually on progress to reduce abandoned waste	ESABC supports the idea of working with the other stewardship programs and the Regional Districts to determine the scope of the abandoned electronics issue and to better understand the causes and possible solutions
We respectfully request that ESABC include a commitment in the plan to work with local governments to research the problem of abandoned electronics and develop a strategy to address this issue. We ask that the plan commit to developing relevant performance targets once the research is complete and the nature of the problem is understood. These targets may fall under stakeholder engagement and satisfaction (e.g. number of calls received by municipalities for abandoned electronics) or environmental performance (e.g. quantity of abandoned electronics).	See comment above
Stewards assist local government with clean-up of illegally dumped E-waste as this is a big issue in our region due to insufficient access to depots	See comment above
MEASUREMENTS COMMENT/QUESTIONS	RESPONSE
When tracking total volume collected, does it include events and non-depot collection networks?	Yes, all of the volume is included in the published numbers and all material is reported. It is weighed at the consolidation point (and the recycler) and these totals are audited every year.
What percent of materials being collected are recovered?	ESABC has committed to tracking this over the next few years. Refer to Section 2, Table 1 of the Stewardship plan.
How do you think quantities being collected will change in the future? Are targets achievable given lowering product weights?	The targets based on the averages over the last several years and there is a trend that newer products are getting much smaller and lighter. However, we are also collecting more types of products. All of these factors were weighed in the setting of our targets.
Is there any way of estimating proportion of categories of materials that are reused vs. recycled vs. incinerated?	As outlined in Section 2, Table 1 of the Stewardship plan, we plan to measure the amount of material recycled compared to the material collected. In addition, we plan to report on mass balancing. However, we do not have a way to track reuse since much of that takes place outside of our control.
Feedback from composition study at RDCO – found achieving 77% diversion rate. Compares tonnage collected in annual report to tonnage extrapolated from the waste comp study.	See comment above. Table 1 in Section 2 outlines those performance factors that the program will be measuring.
With so much outreach, there is still illegal dumping of electronics. Any way to find why people still are dumping illegal?	The program is working with our advisory committee to monitor this and supports the idea of working with other stewardship programs and the RDs to understand the scope of the issue and potential solutions.
How do you estimate awareness level?	The program does public opinion surveys every year using reputable survey companies.

MEASUREMENTS COMMENT/QUESTIONS	RESPONSE
<p>Why are there no consumer awareness targets for the next five years?</p>	<p>As outlined in Section 5 of the plan, the target is 65% consumer awareness on a 3 year rolling average.</p>
<p>The target to maintain 65% consumer awareness seems low. We ask that ESABC strengthen this target and aim for continuous improvement in 2012-16</p>	<p>The Program has worked hard from the beginning to increase awareness and the success of the program in increasing the volume of electronics collected attests to the effectiveness of those efforts. We believe that 65% is a good overall target recognizing that awareness measures are higher during advertising cycles on TV (and other media) and lower when we are not doing a campaign.</p>
ACCESSIBILITY COMMENT/QUESTIONS	RESPONSE
<p>Is the driving distance target the plan commits to 30 minutes or 45 minutes in rural areas?</p>	<p>The metric used in the GIS study was within a 45 minute drive in rural areas (minimum 4,000 people) and a 30 minute drive in urban areas (150,000+ people). The plan targets 90% consumer access, as defined by the GIS study.</p>
<p>We respectfully request that you change the accessibility target, from maintaining the existing collection network and schedule of collection events, to expanding collection coverage. ESABC has six collection locations in Vancouver and we are not satisfied that this provides enough coverage. We also ask that the plan include a commitment to review the accessibility target and size of catchment areas by taking into consideration the public's perception of convenience, and, if warranted, revise the catchment areas and target accordingly.</p>	<p>ESABC has expanded its collection network every year since its inception and will continue to do so where practical. In areas where zoning or community objections are an issue, we welcome cooperation with local government in overcoming these obstacles.</p>
<p>The challenge with the program related to that fact that the standard of access is not tied to solid waste services currently offered by the RD. Consumers can buy products in communities, but have to drive significant distance to return product. Residents take program products to landfills and transfer stations without consequence. They wouldn't drive 45 mins when can drive 15 mins to landfill, when bought in that community. Communities on highway 16 are not "isolated" – on a major transportation route. Products moving through communities, but residents who are paying fees don't have adequate opportunity to return. One day collection events are not an acceptable long-term solution as are not convenient enough to keep out of landfill. Can't do material bans or tipping fees to promote program, if have to tell residents that must keep for 6 months in their basement.</p>	<p>Locating suitable depots is a challenge in rural and remote areas. The collection events are a proxy but depots are the best solution. The challenge is finding someone to take product as it is not a stand-alone business. Storage space is needed and it usually needs to be part of another business to be viable. Other RDs are collection sites for programs and we want to work together to see if RD sites are suitable locations (transfer stations etc.).</p>
<p>Only depot in RD is in Prince George. Consumers want convenience in their own communities, not just where they shop.</p>	<p>See comment above.</p>
<p>Have you had any discussions with Big White? Would have more than 4,000 people at certain times of year</p>	<p>Depots are the preferred solution but in seasonal areas this may not be practical. Collection events held in conjunction with other stewardship programs are likely the best solutions here.</p>
<p>More than 45 minute drive for many in the Sunshine coast to only depot. RD must deal with materials at the landfill and unhappy residents.</p>	<p>ESABC has spoken to board of SCRD and the difficulty is finding a suitable location. We have been canvassing areas looking for a depot but have been unsuccessful so far. In the interim, round up events in conjunction with other stewardship programs may be the best solution.</p>
<p>Will an event be scheduled in the SCRD for this coming year?</p>	<p>See comment above.</p>
<p>Currently we have 1 registered depot in Gibsons. This is not adequate for the Sunshine Coast community and we are advocating for a depot in each of the three population/commercial areas. Until these depots are established there needs to be an annual round up program.</p>	<p>See comment above.</p>

ACCESSIBILITY COMMENT/QUESTIONS	RESPONSE
<p>Program worked really hard to get a new depot in Kootenay Boundary. As more and more products coming on stream, argument that can only buy them in larger centres no longer holding true. Smaller centres selling some of covered products now, including online sales (Sears).</p>	<p>ESABC continues to expand the network. We are exploring options with First Nations about different models for isolated rural areas. This could act as a pilot project to build on for other isolated areas.</p>
<p>Would you consider alternative collection model for areas with a low population but three distinct communities?</p>	<p>Our goal is to fulfill basic network and then investigate gaps. We continue to consider alternative models.</p>
REGIONAL DISTRICTS AS DEPOTS COMMENT/QUESTIONS	RESPONSE
<p>Would the program consider co-locating at government eco depots?</p>	<p>The program would be willing to co-locate at government eco depots and is prepared to pay the same tonnage fees that are paid to anyone else.</p>
<p>From our ZWMP — co-location of EPR programs, or pay a facility to handle product on the program stewards behalf</p>	<p>See comment above</p>
<p>RDs often don't have the infrastructure and capital costs required to build infrastructure. RD has limited funds. Cost is supposed to be transferred to stewards.</p>	<p>The per tonne fees paid by ESABC cover labour, capital costs, etc. However, the program does not directly pay for capital cost. This works for all the depots and other RDs. There may be other options for depot locations (i.e.. transfer stations) and we are prepared to investigate these solutions and other ways to work together with RDs.</p>
<p>RDNO board is very interested in a comprehensive eco-depot and idea of one stop drop.</p>	<p>If the RD wants to collect electronics, the program will be happy to work with them and pay them the same rate as anyone else. They would need to do their own business study to see if it will make sense for them.</p>
<p>Stewards need to fund regular waste audits as one indicator for their targets & need compensation formula for program materials that end up at regional landfills</p>	<p>See comments above</p>
<p>Permitted small fee at transfer stations for drop off, so can fund transportation to depot. Is this ok?</p>	<p>See comments above regarding RDs working as depots. While we cannot control fees being charged by RDs, we do not support that concept as it discourages recycling by the public.</p>
<p>The Regional District of Fort George did a pilot project with ESABC, with a depot at the landfill. Requires huge amount of staffing time and storage area.</p>	<p>There are staffing requirements when operating this kind of depot and some storage is required based on pick up frequency. If storage is an issue, we can work with RDs toward better pick up schedules.</p>
<p>Better incentives/compensation for depots</p>	<p>See comments above</p>
<p>RDs are very staff resource limited. Can't continue to come back to give input on where depots are required. Would be appreciated if stewards could come to RD with ideas of what want to establish, and can provide feedback. Can't rely on RDs to come to stewards. Time is too limited.</p>	<p>ESABC is adding more resources on the ground to assist RDs on these types of issues. We are committed to providing more resources to liaise and communicate with RDs.</p>
PHASE IV COMMENT/QUESTIONS	RESPONSE
<p>Do depots have room for Phase 4? Concern about the space required.</p>	<p>Large materials will be handled by B2B and thus, will not rely on the depot network. The new phase 4 materials that do go into the depot network should not be overly onerous or require much space.</p>
<p>Can a depot just collect Phase 4?</p>	<p>No, if they collect one phase, the expectation is that they will be collecting all phases.</p>
<p>Will all phase 4 products go through Encorp depots?</p>	<p>The intention is that authorized dealers handling other ESABC materials, would also handle some phase 4 products. However, some larger Phase 4 products and specialty items will not go to depots and will likely have their own channels (B2B).</p>

PHASE IV COMMENT/QUESTIONS	RESPONSE
<p>Products that would not go into depots (large B2B etc.). What if someone only has one or two large items, like a photocopier?</p>	<p>The detailed logistics of Phase IV are still being developed but it is likely that the supplier/producer would be contacted for recycling of large products. That process would be audited and reported by the program.</p>
<p>Yes, see large photocopiers at local landfills</p>	<p>See comment above</p>
<p>What about other Phase 4 products? Large appliances s etc.?</p>	<p>An outline of products ESABC is proposing to handle in Phase IV is available in Appendix B of the plan. There could be some revision and addition to this list as the program is developed but large appliances will likely be handled by another stewardship program</p>
<p>Phase 4 – those are all products that program will be collecting?</p>	<p>Yes, these are examples of products that the program will collect. A lot of it will be industry self-managed, but ESABC will audit, report etc.</p>
<p>The participants of our meeting yesterday asked that ESABC considers sector specific meetings with the MEDEC’s member companies (and other medical devices companies) in order to facilitate industry specific progress towards compliance.</p>	<p>ESABC has been working with MEDEC and other Phase IV stakeholders to develop details of the funding and operation of those Phase IV products which are outlined in Appendix B of our stewardship plan.</p>
<p>In section 2.3 (d) are Medical Devices mentioned, which I appreciate. We had yesterday an internal meeting and it was discussed that we intend to keep equipment that requires structural changes to a building, e.g. bolting to walls or floor, additional protective structures/walls, etc.</p>	<p>As described above, the details of how specific products will be classified, funded and collected are still being determined This is five year review of existing program and consultation on Phase 4. However, details of the Phase IV plan are still being developed</p>
<p>Does this consultation session cover all phase 4 products? I understand that the 45 day period ends tomorrow. For electronics manufacturers that have not submitted comments by then, what are the options for providing input to this process? Can comments be accepted and considered after the 45 days ends?</p>	<p>Although comments for the stewardship plan closed on July 8, input on the Phase IV program is still being accepted and solicited from various stakeholders. These details will continue to be developed over the next several months</p>
STEWARDS HARMONIZATION COMMENT/QUESTIONS	RESPONSE
<p>Will all stewards harmonize and move towards eco depots? If do joint events/depots with other programs, then message is consistent across the province.</p>	<p>The stewardship programs are working to harmonize their efforts; however, not all depots can handle hazardous waste. In addition there are often other issues (i.e. zoning, etc.) so there are no ‘cookie cutter’ solutions.</p>
<p>Have you explored partnering with other stewards for round up events?</p>	<p>We fully understand importance of harmonization and consistent messaging. BCStewards.com is a great start as is Recycling Handbook. Yes, we have begun joint initiatives with other stewards in areas like round up events.</p>
<p>What about cell phones? Partnership with those other programs is important, as consumers getting confused.</p>	<p>ESABC decided not to include cell phones in the program as there are two programs in place to recycle cell phones (Call2Recycle and Recycle My Cell). We cooperate with these organizations as much as possible to avoid consumer confusion.</p>
<p>How do you intend to communicate to public what is in program and what is excluded?</p>	<p>There is a clear distinction between what the program is collecting and what other specialized programs are doing. We understand the need for the stewards to work together and that has already begun. The Recycling Handbook is a good example of that cooperation in communication to the public.</p>
<p>All stewardship program plans that we are being consulted on are generically worded. Lots of intentions. Difficult to provide feedback on programs that say will be figured out later. Not enough details in all program plans.</p>	<p>The ESABC stewardship plan does provide details and specific commitments. It would not be practical for the plan to include all of the day to day operational details but those are consistent to the commitments in the stewardship plan.</p>

COMMUNICATIONS COMMENT/QUESTIONS	RESPONSE
There are so many unendorsed options. Unless consumers look to program for advice, consumers are none the wiser.	The program has developed good customer awareness but we are not an enforcement agency. We can only ensure that what the program endorses and collects is handled responsibly. The more material that can be driven into the program or approved reuse organizations, the better.
Do you do research into most efficient communication methods?	Yes, We are starting to ask those types of questions in our awareness surveys.
Trend with young people is social media, etc.	We agree that social media is a good tool for communication with some demographics. This needs to be done right and we will likely be looking to do this jointly with other stewards.
Local classifieds and free papers exist in most communities. These could be useful to help advertise the program and events.	ESABC is always exploring opportunities to reach the public with the recycling message. This could be an effective means of communication in some smaller communities
FEES COMMENT/QUESTIONS	RESPONSE
How do consumers know how the EHF is collected?	In most cases, EHF's are shown as a visible fee on the receipt. If not, they are communicated to the customer in other ways at the point of sale. The program does compliance audits to ensure that the appropriate amount is collected. The program communicates that the fee is not a tax, but a fee levied by members to fund the program.
How does the program impact those that buy electronics online? How do you establish cost associated with internet sales?	Internet sales are subject to the same fees as products sold through other channels and most major online retailers are already ESABC members. The fees on internet sales in the province of BC are the same as those sold in stores.
Eco-fee was reduced before there was adequate service in rural communities. Would have liked to see depots in our community before fees lowered.	Program coverage in BC is among the best in North America and we continue to work on improving the network. Funding is generally not the issue in remote locations as much as finding suitable operators for depots in these areas
The reduction in fee structure (20-70%) was not appropriate before all regions had adequate access for residents.	See comment above
Wide range of product categories. How are you able to determine recovery rate of different products? What is breakdown of product categories collected?	The program currently collects materials in three streams. One is tvs/monitors, the second is CPUs/Laptops and everything else goes into mega-bag. We sample 15% of the collected materials to see what getting out. All of this is reported in our Annual Reports.
It is already quite cumbersome to charge different amounts of EHF & then report sales & collections on 12 different products! I think it is VERY important to keep the number of products to a minimum - fewer different rates & products needs to be a high priority to keep people on side with recycling	ESABC has made every effort of keep the number of classifications as low as possible. However, we are committed to preventing cross-subsidization of products and that requires us to have enough different classifications to cover the range of products handled
I needed to know about the new obligated cables & accessories. We sell some cables (different lengths) that cost between \$4 -\$25. How do we justify charging \$3.50 for recycling? Can you please give me more details on the cables & accessories?	There is currently no fee charged for cables. Classification information to confirm this is available on our website.
As part of ESABC's work to explore new funding models, we would like to see a commitment to explore differentiating eco-fees by brand owner to reflect the true cost of recycling and reward investments in environmental design. Because current fees are the same for each company regardless of how much it costs to recycle, there is no financial incentive for them to design greener products.	ESABC has attempted to balance the various factors in establishing EHF's. Differentiating products based upon their design relative to the environmental impact is not practical as it would require that every product made by every producer be independently evaluated and potentially carry a different EHF. This would create much confusion with the public and retailers and would be complicated, costly and difficult to manage. Product design issues are being tackled by initiatives at the national and international levels which we track closely, including the regular Designing for the Environment analysis undertaken by EPSC (www.epsc.ca).

FEES COMMENT/QUESTIONS	RESPONSE
<p>Starting to get in flat screen TVs at depot. Life expectancy is getting shorter on these products and mix of products being returned is changing.</p>	<p>The product mix and characteristics are constantly changing. This is why we do periodic fee reviews to ensure that the EHF's continue to accurately reflect the costs of recycling</p>
PACKAGING REGULATIONS COMMENT/QUESTIONS	RESPONSE
<p>What about packaging? How will new order of council impact?</p>	<p>It is too early to tell how this will impact and we have three years to work that out. It is open to producers to decide how to deliver program.</p>
<p>Do you recycle packaging associated with the electronics?</p>	<p>See comment above</p>
<p>Although producers have started to address life cycle impacts of electronic products, packaging should also be included, particularly in light of the upcoming regulation for packaging.</p>	<p>See comment above</p>
REUSE COMMENT/QUESTIONS	RESPONSE
<p>Do you have any interface with Computers for Schools?</p>	<p>Computers for Schools is represented on our advisory committee. We are hoping that more reuse organizations will go through the audit process to meet the reuse standard.</p>
<p>Electronics Reuse and Refurbishing Program: We recommend modifying the commitment in the plan to not only endorse but actively promote the organizations that successfully meet ESABC's reuse certification standard</p>	<p>ESABC will endorse reuse organizations that have been successfully audited to the program standard and will work with them to promote reuse.</p>
<p>Reuse organizations don't see incentive to have this done. Scope of the requirements – are there loopholes that would allow for materials to get offshore?</p>	<p>As noted above, the audit standard is intended to prevent offshore exporting. While we cannot mandate participation in our program, there are benefits for the reuse programs to be endorsed by ESABC.</p>
<p>Is there not a requirement for an audit?</p>	<p>This is only a standard for participation in the program. They are only required to be audited if they want to be endorsed by the program.</p>
<p>What is the program doing about reuse and product design?</p>	<p>See comments above regarding reuse. Product design issues are being tackled by initiatives at the national and international levels which we track closely, including the regular Designing for the Environment analysis undertaken by EPSC (www.epsc.ca).</p>
RETURN TO RETAIL COMMENT/QUESTIONS	RESPONSE
<p>Best Buy has a program – will take old TV when buy a new one.</p>	<p>Some retailers are looking at return-to-retail as a business opportunity. Our responsibility is to provide an efficient system to collect and manage e-waste and it includes a voluntary return to retail component.</p>
<p>We would like to see a commitment in the plan to expand the voluntary return-to-retail program. Return-to-retail should also be included in the description of the collection facilities in the consumer access section of the plan, Also, to create an incentive, we strongly recommend that ESABC compensate retailers for providing this service</p>	<p>ESABC does support a return-to-retail program on a voluntary basis and those who do participate in the program are compensated.</p>

MISCELLANEOUS COMMENT/QUESTIONS	RESPONSE
What if electronics are dismantled, will the program still take them?	The program does take dismantled electronics as long as they are in a condition that presents no hazard to transport
Will sites accept products that have been disassembled?	See comment above
Section 3.0 says, “The Program is working with producers to develop new funding models to cover the costs associated with implementing new service delivery models such as industry self-management (ISM) for Phase IV products.” Is “industry self-management” a form of “individual producer responsibility (IPR)”? We support IPR for drawing a stronger link between end-of-life management and product design.	Industry self-management (ISM) is not a form of individual producer responsibility (IPR). While the regulations allow for IPR (where producers have responsibility for their own program) the ISM model being explored for Phase IV would be a shared responsibility model, as these producers would be part of the ESABC plan.
What about Phase 3?	Phase III products are being managed by CESA.
What is a consolidation point?	A consolidation point is where the product is transported by Short haul transport for weighing before moving via long haul transport to the processor.
What about inaccurate messaging? In SCRDR, message that ok to put electronics in single stream recycling. Also, steel recyclers taking these products out for salvage.	The Ministry of Environment has asked the program to do a study of unaccounted material (material not going into the program) and this is underway. The results will be published when it is complete. However, the program is not a monopoly and we cannot control what other parties do or their messaging.
ESABC is criminal and started with a \$1 bribe from Encorp Corporation and is fraudulent and extortion of the public and you have been reported to authorities.	ESABC’s mandate originates with the regulations pertaining to stewardship of obligated products in BC. Encorp has been contracted by ESABC to perform portions of the work associated with the collection of electronics as part of that mandate. There are independent audits of ESABC revenues and expenditures as part of our annual report to government.

Appendix D

LIST OF ATTENDEES AT PUBLIC CONSULTATION MEETINGS

NEW WESTMINSTER MEETING

NAME	POSITION	COMPANY OR ORGANIZATION
Andrew Doi.....	Environmental Planner	Metro Vancouver
Ann Johnston.....	Director.....	Mayne Island Recycling society
Bill Reid.....	Executive Director	Cloverdale District Chamber of Commerce
Brigitte Pronovost.....	Supervisor, Solid Waste	City of Port Moody
Buddy Boyd/Barb Hetherington.....	Owners	Gibsons Recycling Depot
Cassandra Caunce.....	Section Head, EM, Business & Standards.....	Ministry of Environment
Chris Falloon.....	Principal	Stonehouse Management Services
David Ellwood.....	Sales	Newalta
Don Blythe.....	TSBC Chair
Donna Bucsis.....	Operations Assistant	City of Port Moody
Ela Lukowska	Waste Diversion Supervisor	City of Surrey
Emy Lai	City of Richmond
Greg Tyson	Analyst.....	BC Ministry of Environment
Jack Liu	Senior Business/Financial Development Officer	Mansonville Plastics
Jason Lee.....	Project Engineer	Metro Vancouver
Jennifer Lukianchuk	Environmental Coordinator	City of New Westminster
Jim Favaro	Post-Consumer Pharmaceutical Stewardship Association
Ken Falconer.....	General Manager Operations	ToxFree Energy Canada
Kim Day	Executive Director	Ridge Meadows Recycling Society
Kim Harris.....	Mayne Island Recycling society
Leanne Koelin.....	Ridge Meadows Recycling Society
Lisa Sullivan	Manager	Abbotsford Community Services Recycling
Mark Den Harder	Account Manager.....	Stericycle
Martin Oconnon.....	Sales	Newalta
Maury.....	Administrator	London Drugs
Mike Marocchi	Director, Scientific & Technical Affairs.....	SISU Inc.
Monica Kosmak.....	Zero Waste Planning Program Manager.....	City of Vancouver
Neil Hastie.....	Encorp Pacific
Richard Aikema.....	Manager	Abbotsford Community Services
Rod Lotzkar.....	Regional Recycling
Scott Temreck.....	Business Development.....	Action Environmental
Tauseef Waraich.....	General Manager	TRI - Technology Resource Inc.
Tom Madigan	Superintendent Street Cleaning	City of Vancouver

PRINCE GEORGE MEETING

NAME	POSITION	COMPANY OR ORGANIZATION
Helen Sherrard	President.....	Canadian Health Food Association
Dave Fuller.....	Owner	Ave Maria Specialties
Vic Caron	President.....	Victor Surplus Equipment Ltd.
Mike Hennessy.....	Executive Director	Tire Stewardship BC
Rachel Simpson	Business Manager.....	Selen Anita Securities Inc. (Canadian Tire)
Kevin Grose.....	Owner/Manager.....	OK Tire Auto Service
Rachael Ryder	Waste Diversion Program Leader	Regional District of Fraser-Fort George
Terri McClymont	Executive Director	REAPS (Recycling & Environmental Action Planning Society)
Janine Dougall.....	Director of Environmental Services.....	Regional District of Bulkley-Nechako
Lyn Smirl.....	Environmental Management Analyst	Ministry of Environment
Petra Wildaur.....	Regional District of Fraser-Fort George

NANAIMO MEETING

NAME	POSITION	COMPANY OR ORGANIZATION
Lyn Smirl	Environmental Management Analyst	BC Ministry of Environment
Wendy Dunn		Capital Regional District
Tom Watkins		Capital Regional District
Will Burrows	Executive Director	Coast Waste Management Association
Michele Patterson	Manager, Environment & Sustainability	Vancouver Island University
Kathleen Milward	Environmental Technologist	Cowichan Valley Regional District
Cathy Kenny	Solid Waste Management Coordinator	Sunshine Coast Regional District
Sharon Horsburgh	Senior Zero Waste Coordinator	RDN
Rob Williams	Environmental Technologist	CVRD
Gary Franssen	Manager of Sanitation and Recycling	City of Nanaimo
Henry Lee	Supervisor, Outreach and Partnerships	Capital Regional District
Sophy Roberge	Public Relations	Cowichan Valley Bottle Depot
Jennifer Crabbe	Operations Manager	Cowichan Valley Bottle Depot
Casey Mitchell	Co-owner	Island Natural Markets
Steve McKerrell	Executive Chairman	Swiss Natural
Michael Schellinck	Executive Director	Nanaimo Recycling Exchange
Mike Johnson		Harbourview Volkswagen
David Brown		Former MoE
Michael Schellinck		Nanaimo Recycling Exchange
Ed Walsh	V.P. Operations BC	Enterra Environmental
Dave Ross	Operations Manager, North Island	Enterra Environmental
Kristi MacMillan	Environmental Management Analyst	Ministry of Environment

KELOWNA MEETING

NAME	POSITION	COMPANY OR ORGANIZATION
Paul Marois	President	Planet Earth Recycling Ltd.
Allan Miedema	Owner/Operator	KP Tirecraft (1977) Ltd.
Don Hamilton	Solid Waste Facilities Coordinator	Regional District of Okanagan-Similkameen
Bert Monesmith	Senior Market Director	EBA, A Tetra Tech Company
Jay Aarsen	Interior Freight & Bottle Depot	
Alan Stanley	Director of Environmental Services	Regional District of Kootenay Boundary
Nicole Kohnert	Manager Regional Engineering Services	Regional District of North Okanagan
Jongjin Lee	Owner	J&C Bottle Depot
Wendy Bennett	Solid Waste Facilities Assistant	Regional District of Okanagan Similkameen
Karen Oh	Boucherie Bottle Depot	
Kristi MacMillan	Environmental Management Analyst	Ministry of Environment
Rick Monahan	Natures Fare Markets	
shaun daniels	Corporate General Manager	Nature's Fare Markets
Ken Muller	City of Kelowna	
Peter Rotheisler	Regional District of Central Okanagan	
Ken	Westbank Bottle Depot	
Lyn Smirl	Ministry of Environment	
Ben Van Nostrand	Waste Management Coordinator	Columbia Shuswap Regional District



Ref: 167098

April 23, 2012

Craig Wisehart, Program Director
Electronic Products Recycling Association
c/o Encorp Pacific (Canada)
206 - 2250 Boundary Road
Burnaby, BC V5M 3Z3

Dear Mr. Wisehart:

Stewardship Plan Approval

Thank you for submitting the Electronic Products Recycling Association (EPRA) Product Stewardship Plan for the period 2012 – 2016 on September 7, 2011, and the subsequent revised and finalized plan on April 5, 2012, in fulfillment of the requirement under section 4 of the Recycling Regulation.

The Stewardship Plan advises that the Electronic Stewardship Association of BC is to be replaced by the new Electronic Products Recycling Association (EPRA) as the responsible organisation for delivery of the stewardship program in BC. The Plan also expands the scope of products, and integrates input from the five year stewardship plan review as required under Section 6 of the Regulation.

I have completed my review of the submission and hereby approve the Electronic Products Recycling Association Stewardship Plan for 2012 - 2016. This Stewardship Plan will replace the Electronic Stewardship Association of BC Stewardship Plan that was approved by the Ministry on December 18, 2006. Please be advised that this approval applies only to materials or content contained in the plan that pertains to the requirements of Section 5 of the Recycling Regulation.

Program Communication and Public Awareness

With the large number of stewardship programs launching on July 1, 2012, and to ensure a successful program launch, it is paramount that the public, consumers, industry, and any other

affected stakeholders are informed of your program and any visible program fees well in advance of the program launch date. To that end, it is our understanding the several stewards/agencies are in the process of combining efforts to develop a collective communications program for stewardship programs launching July 1st.

Equally important to a successful program is ongoing communication and public awareness. We expect you to strive to exceed and continuously improve on the targets for this area in your plan. Given the importance of public awareness, the Ministry is considering establishing a consumer awareness target for eventual incorporation into the Recycling Regulation. We will keep you apprised on the development of this initiative.

Third Party Independent Audit of Non-financial Information in Annual Reports

Please note that the Ministry of Environment, as part of its Industry Product Stewardship compliance strategy, now requires third party testing to confirm prescribed non-financial information reported in industry stewardship agency annual reports. The enclosed document entitled "Guiding Principles - Product Stewardship Agency Non-Financial Information Testing", dated November 15, 2010, contains information and direction for stewardship agencies on the required procedures. For convenience, electronic templates of the test procedures and related documents are available on the Ministry's website at: <http://www.elp.gov.bc.ca/epd/recycling/guide/index.htm>. Please be advised that these Guiding Principles are currently being refined and you will be advised when an updated document is available. Please contact Greg Tyson at (250) 387-9774 if you have questions on this requirement or associated documents.

I look forward to working with you to ensure your program is successfully implemented. If you have any questions about this approval or the implementation of your plan, please contact David Lawes at (250) 387-3588 or David.Lawes@gov.bc.ca.

Sincerely,



David Ranson
Director, Waste Management

cc: David Lawes, Head, Industry Product Stewardship Programs
Greg Tyson, Analyst

File: 50400-25\ELEC-EPRA