

# **TELUS Communications Company**

## **Annual Report to the Director**

### **2013 Calendar Year**

**Submitted to:** Director, Waste Management  
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### 1. Executive Summary

The table below should concisely summarize program performance for the section 8 annual reporting requirements such that ministry staff and the public can easily understand whether reporting requirements and stewardship plan targets have been met.

Products within plan	<p><b>Telecommunication equipment:</b></p> <ul style="list-style-type: none"> <li>○ Cordless phones and corded desktop, VOIP phones and analog terminal adapters;</li> <li>○ Public Access Equipment;</li> <li>○ Obsolete network infrastructure equipment (switches, servers), External customer networks, Servers</li> <li>○ Optical network termination equipment, Internet equipment (routers, modems), Network cards;</li> <li>○ Video and teleconferencing equipment;</li> <li>○ TV equipment (PVRs, receivers, remote controls), Satellite TV equipment;</li> <li>○ Global Positioning Systems (GPS);</li> <li>○ Batteries; and</li> <li>○ Cables/accessories.</li> </ul>
Program website	<p><a href="http://about.telus.com/community/english/about_us/for_our_customers/regulations_%26_policies/environmental_policy/ewaste_stewardship">http://about.telus.com/community/english/about_us/for_our_customers/regulations_%26_policies/environmental_policy/ewaste_stewardship</a></p>

Recycling Regulation Reference	Topic	Summary (5-bullet maximum)
Part 2, section 8(2)(a)	<a href="#">Public Education Materials and Strategies</a>	<p>a description of educational materials and educational strategies the producer uses for the purposes of this Part</p> <ul style="list-style-type: none"> <li>- <i>Public information posted on telus.com website providing instructions on how to return equipment to TELUS at no charge.</i></li> <li>- <i>TELUS client care agents are made aware of return process by way of online system, internal communication, bulletins.</i></li> <li>- <i>TELUS Technicians are made aware of return process by way of inter-company communication, bulletins.</i></li> <li>- <i>Recycling EcoGuide in Yellow Pages directories.</i></li> <li>- <i>Mail Back kit including instructions (new as of August 2013).</i></li> </ul>
Part 2, section 8(2)(b)	<a href="#">Collection System and Facilities</a>	<p>the location of its collection facilities, and any changes in the number and location of collection facilities from the previous report;</p> <p><i>Eight collection facility locations:</i></p> <ul style="list-style-type: none"> <li>- <i>Communication Test Design Inc. (CTDI), Delta BC</i></li> <li>- <i>Telmar Network Technology (Telmar), Calgary AB</i></li> <li>- <i>GEEP, Edmonton AB</i></li> <li>- <i>Ccon Metals Inc., Abbotsford, BC</i></li> <li>- <i>Metalex Products Ltd, Richmond BC</i></li> <li>- <i>Edmonds Recycling, Langley BC</i></li> <li>- <i>Sumas Environmental Services, Burnaby BC</i></li> <li>- <i>UTI Contract Logistics and Distribution, Brampton ON</i></li> </ul>

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Recycling Regulation Reference	Topic	Summary (5-bullet maximum)
Part 2, section 8(2)(c)	<a href="#">Product Environmental Impact Reduction, Reusability and Recyclability</a>	<p>efforts taken by or on behalf of the producer to reduce environmental impacts throughout the product life cycle and to increase reusability or recyclability at the end of the life cycle;</p> <p><i>Although TELUS is not a manufacturer of equipment (TELUS branded or not) that we sell or rent, we endeavor to work with our manufacturers to encourage them when designing for the environment to use minimal packaging materials; FSC certified, high recycled content, and or recyclable or biodegradable materials. Where appropriate and applicable, TELUS will also endeavor to include corporate social responsibility (CSR) requirements in RFPs when selecting vendors.</i></p>
Part 2, section 8(2)(d)	<a href="#">Pollution Prevention Hierarchy and Product / Component Management</a>	<p>a description of how the recovered product was managed in accordance with the pollution prevention hierarchy</p> <p><i>TELUS' triage of recovered equipment enables TELUS to follow the pollution prevention hierarchy, such as the regulation requires, to ensure pollution prevention is not undertaken at one level unless or until all feasible opportunities for pollution prevention at a higher level have been taken.</i></p>
Part 2, section 8(2)(e)	<a href="#">Product Sold and Collected and Recovery Rate</a>	<p>Provide a summary of the total amount of product sold, collection volumes and, if applicable, recovery rates achieved by the program based on the approach included in the approved program plan. Also provide a summary of total product recovered by regional district.</p> <p><i>Total Program Product Collection Volumes in 2013 is 702 mt Total Program Product Distributed into BC in 2013 is 2,334 mt Total Program Product Recovery Rate in 2013 is 21.23%</i></p> <p><i>See section 7 for details</i></p>
Part 2, section 8(2)(e.1)		<p>[See Section 7 for breakdown per regional district] <i>Not available</i></p>
Part 2, section 8(2)(f)	<a href="#">Summary of Deposits, Refunds, Revenues and Expenses</a>	<p><b><i>[Provide report reference to the independently audited financial statements]</i></b> <i>Not applicable as TELUS fully funds program.</i></p>

Comparison of Key Performance Targets		
Part 2 section 8(2)(g); See full list of targets in <a href="#">Plan Performance</a>		
Priority Stewardship Plan Targets (as agreed with ministry file lead)	Performance	Strategies for Improvement
1. <i>No target was committed for 2013</i>		<i>Customer Premise Equipment (Rental) Return Improvement Implementation Plan Development &amp; Project Launched in August 2013.</i>
2.		
3.		

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## Program Outline

*Provide a brief (1 page) overview of the stewardship agency/company and their members [website link], program inclusions, collection approach and any other high level information relative to the annual report e.g. studies completed, new targets set, consultations or surveys conducted.*

*TELUS Communications Company (TELUS) has developed its own BC Electronic Equipment Stewardship Plan to adhere to the requirements set in the BC Recycling Regulation – Electronic and Electrical Product Category*

*TELUS has been collecting, refurbishing for reuse, reselling, and recycling electronics for many years now and this plan will allow these processes to be tracked more formally and reported annually to the Ministry. TELUS' plan addresses rental and retail TELUS customer premise equipment as well as our internal use equipment. Mobile devices are addressed under the Canadian Wireless Telecommunication Association's (CWTA) Stewardship Plan – Recycle My Cell.*

*The following is a general list of categories of equipment with regards to the requirements outlined by the BC Recycling Regulation – Electronic and Electrical Product Category. This list is an overview and does not list accessories or additional paraphernalia that might be associated with each equipment category. TELUS is committed to be responsible for all new products TELUS introduces into the marketplace.*

- *TELUS TV Equipment (Set-top boxes, PVRs, Receivers, Remote Controls)*
- *TELUS Internet Equipment (Routers, Modems, Gateways)*
- *Network Cards*
- *Public Access Equipment*
- *Cordless and Corded Phones (wireline)*
- *VOIP phones*
- *VOIP Analog Terminal Adapter*
- *Satellite TV equipment*
- *Global Positioning System (GPS) equipment*
- *Video and telephone conferencing equipment*
- *Batteries associated with these electronics*

*Website:*

[http://about.telus.com/community/english/about\\_us/for\\_our\\_customers/regulations\\_%26\\_policies/environmental\\_policy/ewaste\\_stewardship](http://about.telus.com/community/english/about_us/for_our_customers/regulations_%26_policies/environmental_policy/ewaste_stewardship)

## 2. Public Education Materials and Strategies

*Provide a brief overview of the key materials and strategies used to promote awareness of the program. Identify the various types of outreach (i.e. face to face, social media, traditional media, etc.) utilized.*

**Reference:** Recycling Regulation – Part 2, section 8(2)

(a) a description of educational materials and educational strategies the producer uses for the purposes of this Part

1. *Call Centre Awareness – call centre representatives are informed about the program and are equipped with the information necessary to advise customers of their equipment return options.*
2. *TELUS Call Centre representatives coordinate pickup and return of business customer equipment to TELUS.*
3. *Return mailer kits including return instructions provided to TELUS TV and TELUS Satellite TV customers. This program was expanded in August 2013 to include all TELUS TV and high speed internet access (HSIA) customers.*
4. *TELUS Website – the website contains information for residential and business customers on how to return items*
5. *Yellow Pages (ecoGuide) – includes appropriate TELUS equipment return information*  
<http://eco.yellowpagesdocuments.ca/doc/eco-BC/vancouver/2011030701/#0>
6. *TELUS participates in the RCBC Recycling Hotline service.*

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7. *TELUS Technician Awareness – our technicians are informed about the program and TELUS’ commitments to our customers with respect to equipment being returned.*
8. *TELUS Team Members Awareness –team members are provided with current information regarding the return of electronic equipment in this plan thru a number of mechanisms. Mechanisms include online process information on our internal company website, inter-company bulletins, TELUS Green Teams, internal social media, and as required one on one email and phone conversations.*

### 3. Collection System and Facilities

*Provide a brief overview of the way in which the stewardship agency collects the products from the consumer (i.e. depots, return to retailer, collection events, etc.). If available, list the number of collection facilities in each regional district and identify changes in the number, location, and method of collection from the previous year to the present year. If the list is extensive, consider including a summary and attaching a separate document or URL.*

**Reference:** Recycling Regulation – Part 2, section 8(2)

(b) the location of its collection facilities, and any changes in the number and location of collection facilities from the previous report;

*Eight collection facilities owned by TELUS or TELUS Contractors/Vendors receive customer returns through recovery mechanisms. Both TELUS Technicians and TELUS Contractors recover equipment from customers and return to collection facilities. To ensure that all of our customers have access to a collection facility, TELUS provides a mail back program. TELUS residential customers have access to and Canada Post retail outlet in their area and TELUS business customer are provided with a courier pickup service.*

*Collection facility locations:*

- *Communication Test Design Inc. (CTDI), Delta BC*
- *Telmar Network Technology (Telmar), Calgary AB*
- *GEEP, Edmonton AB*
- *Ccon Metals Inc., Abbotsford, BC*
- *Metalex Products Ltd, Richmond BC*
- *Edmonds Recycling, Langley BC*
- *Sumas Environmental Services, Burnaby BC*
- *UTI Contract Logistics & Distribution, Brampton ON*

*To provide easy access to TELUS’ collection facilities in all Regional Districts, Canada Post, couriers (e.g. FedEx), and TELUS technicians are recovery mechanisms that increase public access to the Collection Facilities. For example, Canada Post has over 6,600 retail outlets across Canada. The Canada Post retail outlets and the location of each are available on the Canada Post website at <http://www.canadapost.ca/cpotools/apps/fpo/personal/findPostOffice>*

### 4. Product Environmental Impact Reduction, Reusability and Recyclability

*Identify ways in which producers or the agency contributes to the reduction of environmental impact. For example, utilization of certified processors, R&D performed to improve recyclability / reuse of the product or components, examples of design for environment mechanisms used by producer members of the agency, reduction of greenhouse gas emissions. The producer may also wish to report on the status of any studies being undertaken to assist with the measurement of environmental impacts. Identifying successes is encouraged.*

**Reference:** Recycling Regulation – Part 2, section 8(2)

(c) efforts taken by or on behalf of the producer to reduce environmental impacts throughout the product life cycle and to increase reusability or recyclability at the end of the life cycle;

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*TELUS has made significant efforts to reduce environmental impacts throughout the product life cycle and to increase reusability or recyclability at the end of the life cycle. For example, all recovered modems and TV set top boxes are tested and all products that pass the testing are refurbished and reused up to three times before the product is considered for the next step in our product pollution prevention hierarchy.*

*When TELUS has exhausted all reuse mechanisms (e.g. redeployment within TELUS internally or our customers, resale opportunities) products that are end of fate TELUS uses ISO 14001 certified processors to recycle the products.*

### 5. Pollution Prevention Hierarchy and Product / Component Management

*Provide a brief overview of the way in which the collected product is managed and how those outcomes relate to the pollution prevention hierarchy. Provide breakdowns by weight or percentage of product managed at each level. Please also refer to third party assurance FAQs (original version dated November 22, 2012), distributed to stewardship programs by the Ministry.*

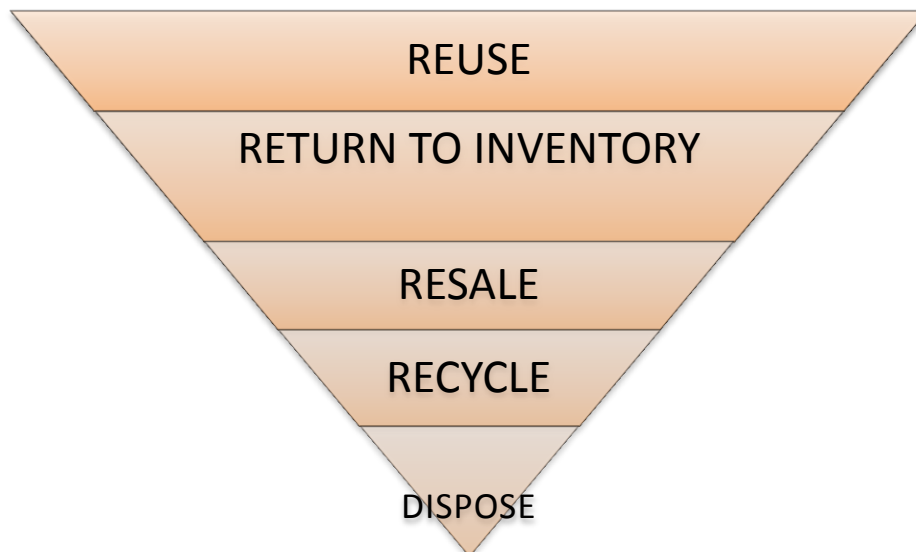
**Reference:** Recycling Regulation – Part 2, section 8(2)

(d) a description of how the recovered product was managed in accordance with the pollution prevention hierarchy;

*Program Products collected are reported by End of Fate both by material commodity and by level on the Pollution Prevention hierarchy:*

- *Reuse: devices that are either reused by TELUS or sold for the purpose of reuse or refurbishment for reuse.*
- *Recycle: products that are processed into an End of fate commodity (e.g. Ferrous Steel, Plastics, Aluminum, Copper, Glass, etc.).*
- *Recover: There currently are no processes for recovery into Energy although TELUS closely monitors developments in this industry.*
- *Waste: waste going to landfill or hazardous waste from all sources that is not reusable.*

*Disposition Hierarchy*



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### 6. Product Sold and Collected and Recovery Rate

Provide a summary of the total amount of product sold, collection volumes and, if applicable, recovery rates achieved by the program based on the approach included in the approved program plan. Also provide a summary of total product recovered by regional district.

**Reference:** Recycling Regulation – Part 2, section 8(2)

- (e) the total amount of the producer's product sold and collected and, if applicable, the producer's recovery rate;
- (e.1) effective for a report required on or before July 1, 2013 and for every report required under subsection (1) after that date, the total amount of the producer's product recovered in each regional district;

#### *Program Product Collection Volumes (by weight):*

- *Total program product equipment 522 mt (up from 451 mt in 2012)*
  - *>2 kgs Batteries 177 mt*
  - *Consumer Batteries 3 mt*
- Total program product collection volumes during 2013 was 702 mt (up from 594 mt in 2012)*

#### *Program Product Distributed into BC (by weight)*

- *Total program product distributed into BC during 2013 was 2,334 mt*  
*\*we estimate this amount based on our inventory system however during 2012 we implemented new processes and controls to help strengthen our reporting recognizing that there is a minor net variance of less than 1% between the numbers here and actuals.*

#### *Program Product Recovery Rate:*

- *Program product recovery rate for 2013 was 21.23% (up from 16.10% in 2012). This is based on the number of units collected and the number of units distributed. It is important to note that TELUS primarily distributes rental equipment and products that last for a number of years supported by network equipment that lasts for decades. As a result the ratio on an annual basis of recovered products compared to what was distributed into the market may seem small. However once you consider that the average lifecycle of our products is greater than 5 years a relative recovery rate makes more sense. This should be further rationalized against an expanding install base.*
- *TELUS' Customer Premise Equipment (Rental) Return Improvement Implementation Plan Development & Project commenced in August 2013 where TELUS provided returns kits to our rental customers in an effort to increase the recovery of set top boxes. We are pleased to announce that our recovery on set top boxes was an 88.22% increase over previous year returns.*
- *Overall receipt of all Plan products recovered increased 30.90% over previous year.*

#### *Reuse Rate:*

- *TELUS' reuse rate is 107% as a result of TELUS' robust disposition process. For example, TELUS will reuse most consumer products up to three times during its lifecycle. This demonstrates the results of our focus on the Pollution Prevention hierarchy.*



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### 7. Summary of Deposits, Refunds, Revenues and Expenditures

**For those programs that charge deposits only:**

Include a summary of deposits received and refunds paid in British Columbia by the producers (by plan if agency manages more than one plan). Attach a copy of the current year's independently audited financial statements as an appendix.

**For those programs that charge a visible ecofee only:**

Include a summary of fees / rates charged by the agency and provide a summary of total revenues and expenses in British Columbia (by plan if agency manages more than one plan). Attach a copy of the current year's independently audited financial statements as an appendix.

**Reference:** Recycling Regulation – Part 2, Section 8(2)

(f) independently audited financial statements detailing

- (i) all deposits received and refunds paid by the producers covered by the approved plan, and
- (ii) revenues and expenditures for any fees associated with the approved plan that are charged separately and identified on the consumer receipt of sale;

*TELUS funds the TELUS BC Electronics Stewardship Plan. No customers are charged an environment handling fee.*

### 8. Plan Performance

Using the table below, provide a brief overview of the performance of the plan for the current year compared to the stated performance requirements and targets specified in the approved plan. If no specific targets have been set (e.g. new plans in first year of operation), specify baseline results, significant achievements and identify when targets will be set.

**Reference:** Recycling Regulation – Part 2, section 8(2)

(g) a comparison of the approved plan's performance for the year with the performance requirements and targets in this regulation and the approved plan

Plan Target	2012 Results	Strategies for Improvement
1. No target was committed for 2013		Customer Premise Equipment (Rental) Return Improvement Implementation Plan Development & Project Launched in August 2013

### Appendices / Additional Information and Third Party Assurance

- Third Party Assurance Statement for Non-Financial Information

**Reference:** Recycling Regulation – Part 2, section 8(2)

Including section 8(2)(h), any other information specified by the director