

**Canadian Brandowner Residual
Stewardship Corporation
Stewardship Plan**

**Appendix 1
Electronic Toy Stewardship
Program for British Columbia**

**Prepared for the
Canadian Toy Association**

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Executive Summary

The Canadian Toy Association in partnership with the Canadian Brandowner Residuals Stewardship Corporation will launch the Stewardship Plan for Electronic Toys on July 1, 2012.

The development of a Stewardship Plan for Electronic Toys poses a unique challenge, as there is no way to estimate the volumes of product returned by consumers using different collection methods. As such, the the first two program years of the Stewardship Program for Electronic Toys will generate credible information on efficient collection methods, recoverable volumes and recovery rates. The initial information will be used to further refine and/or modify the implementation of the Stewardship Program.

Because there was virtually no information on the volumes and nature of Electronic Toys, the CBRSC in partnership with the Canadian Toys Association and consultants from Sustainability Services undertook a pilot project on October 2, 2010. The results of the Pilot are summarized in this Appendix and the results used to guide the intended collection, transportation and processing of residuals.

The Stewardship Program for Electronic Toys intends to emphasize events and permanent collection centers at retail stores, schools and malls because of their proximity to population plus ease of access, space and transportation. In addition, the Stewardship Program will work with Producers and large retailers to integrate the Stewardship Program elements in their marketing programs.

A draft stewardship plan was used in consulting with Producers and stakeholders. At the consultations, stakeholder concerns and suggestions were heard and the plan was revised to address the feedback received (see Section 5 and Appendix 1).

Section 1: Introduction to Electronic Toys Stewardship

1.1 Background

The stewardship plan for **Electronic Toys** was developed by the Canadian Brandowner Residual Stewardship Corporation (CBRSC) on behalf of the Canadian Toy Association.

The stewardship plan was written to meet the requirements of Part 2 of the BC Recycling Regulation for the Electronic Toys product category. The CBRSC will perform all the duties of the Producers listed on the CBRSC website under Part 2 of the Recycling Regulation and will be effective July 1, 2012.

Producers of Electronic Toys listed on the CBRSC website have notified the CBRSC in writing that they wish to be covered by this Stewardship Plan in order to meet the requirements of Part 2 of the Recycling Regulation.

The CBRSC has been working with the Canadian Toy Association for the past 12 months developing a comprehensive and effective stewardship plan. A pilot project that tested assumptions was completed on October 2, 2010 in Vancouver. The results of the pilot along with industry data were useful in determining the appropriate stewardship model for unwanted Electronic Toys.

1.2 Management

The CBRSC will contract the administration and operation of the Stewardship Plan to a qualified program operator.

The program operator will be responsible for the day-to-day operations of the CBRSC's Stewardship Programs. The activities include:

- Public Consultation
- Program Administration
- Capital Procurement
- Reporting
- Auditing
- Providing collection infrastructure
- Organizing transportation logistics
- Processing and recycling
- Generation and communication of data and information
- Public Awareness and communications

The CBRSC will undertake a variety of administrative functions including:

- developing and amending the Stewardship Plan as required;

- preparing reports for regulatory agencies, Board of Directors and stakeholders;
- overseeing the budgets and financial audits;
- undertaking stakeholder consultation and organization of Advisory Committees;
- resolving disputes and investigating complaints;
- developing annual business plans including annual strategies and actions designed to meet Performance Measures (see Section 4);
- maintaining the CBRSC in good standing with Industry Canada.

1.3 Definition of Electronic Toys

The Recycling Regulation clearly defines Electronic Toys in Section 3.2 of Schedule 3. The definition includes:

electronic or electrical toys, including, without limitation, trains, car racing sets, cars and trucks, including remote control and ride on toys, video games and video gaming equipment and consoles.

The Electronic Toys that meet this definition range in complexity from simple battery operated toys that display lights and make simple sounds to sophisticated computer gaming systems that are complex computers and video display units.

Most Electronic Toy products are manufactured, by law, from virgin non-hazardous raw materials such as plastic, paper and cardboard and a range of electronic components. The manufacturing processes include injection molding, blow molding, spray painting, printing, box making and assembly.

Section 2: Current State Assessment

2.1 Electronic Toys Market

The Canadian Toys Association estimates that the Canadian market for toys is approximately \$1.4 billion dollars. Very rough estimates suggest that the national electronic toy component of this total is 15% or 210 million. Based on population demographics from Statistics Canada, BC represents 13% of the national electronic toy market.

The toy business is highly seasonal with consumers making a large percentage of all toy purchases during the traditional holiday season. A significant portion of toy industry customers' purchasing occurs in the third and fourth quarters of each fiscal year in anticipation of such holiday buying. In addition, a small number of retailers account for a large portion of all toy sales.

Competition among the toy manufacturers is intensified due to recent trends towards shorter life cycles for individual toy products, the phenomenon of children outgrowing toys at younger ages, and an increasing use of high technology in toys.

Toy manufacturers deal with a “children getting older younger” phenomenon resulting in children moving away from traditional toys and games at a younger age and the array of products and entertainment offerings competing for the attention of children has expanded. This has resulted in the expansion and creation of more electronic toys as market demands require more sophistication in products.

2.2 *Electronic Toy Categories*

There are seven electronic toy categories developed following results of a consultation with the industry and the pilot project (Table 1). The categorization also attempts to anticipate the need to communicate these product types throughout the distribution chain especially considering program members, retailers, consumers and government.

Table 1: Electronic Toy Categories:

Electronic Toy Categories
Plush Textile
Metal or Hard Plastics with Electronics
Remote Control Vehicles
Ride On Vehicles Small
Ride On Vehicles Large
Hand Held Game Devices
Gaming Devices with PC /TV

2.3 *Collection Estimates*

The sales of electronic toys in BC are estimates based upon the Canadian national market and the percent of population in British Columbia (13.2%).

Unfortunately, there is very little industry information on the life span of Electronic Toys or of Toys in general. Some toys have a very short life span such as electronic toys given out at restaurants and fast food chains compared to very long-lived products that are passed from one generation to another.

In addition, BC’s stewardship program for Electronic Toys will be the first stewardship program for that product category in North America. Consequently, there is not data from which to compare. The only information that may be

relevant is with the sophisticated gaming systems. The expected life span of a computer may be extrapolated for these product types.

Because of the lack of industry data and absence of a similar type stewardship program, the CBRSC undertook a pilot project in Vancouver on October 2, 2010. While the pilot project was successful, the pilot did not provide great insight into the life cycle of electronic toys. The array of products returned could not be consistently defined by age of product, manufacturer, or country of origin.

The toy industry has a vast array of manufacturers from all over the world who are not always easily identifiable. Many manufacturers are no longer in business and consolidation of the industry through acquisition has further complicated the availability of information. The industry at large lacks quantifiable studies on the subject. Engineers asked to define the life expectancy of their products are challenged by the request. The material content of electronic toys are mostly plastic and will not break down due to environmental factors, therefore an electronic toy will typically last beyond the interest a child has to use it. Finally, toys handed from generation to generation are not as common as in the past.

Chart 1: Estimated Number of Units Sold in British Columbia by Product Category

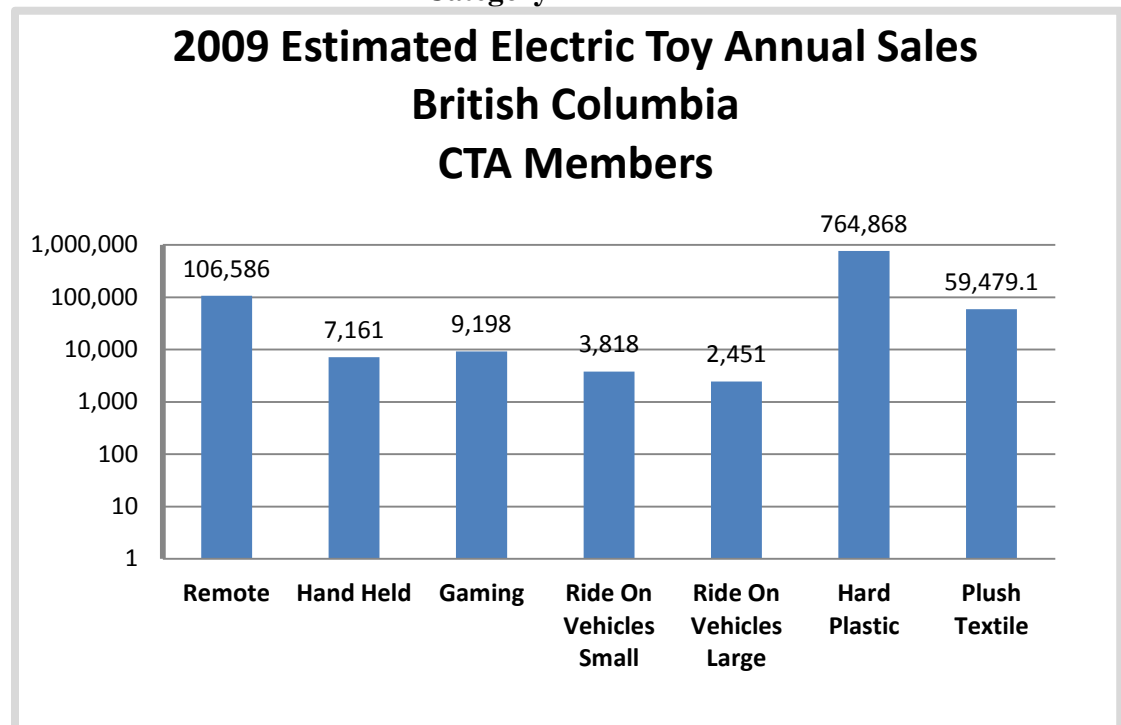


Chart 2: Estimated Kilograms of Units Sold in British Columbia by Product Category

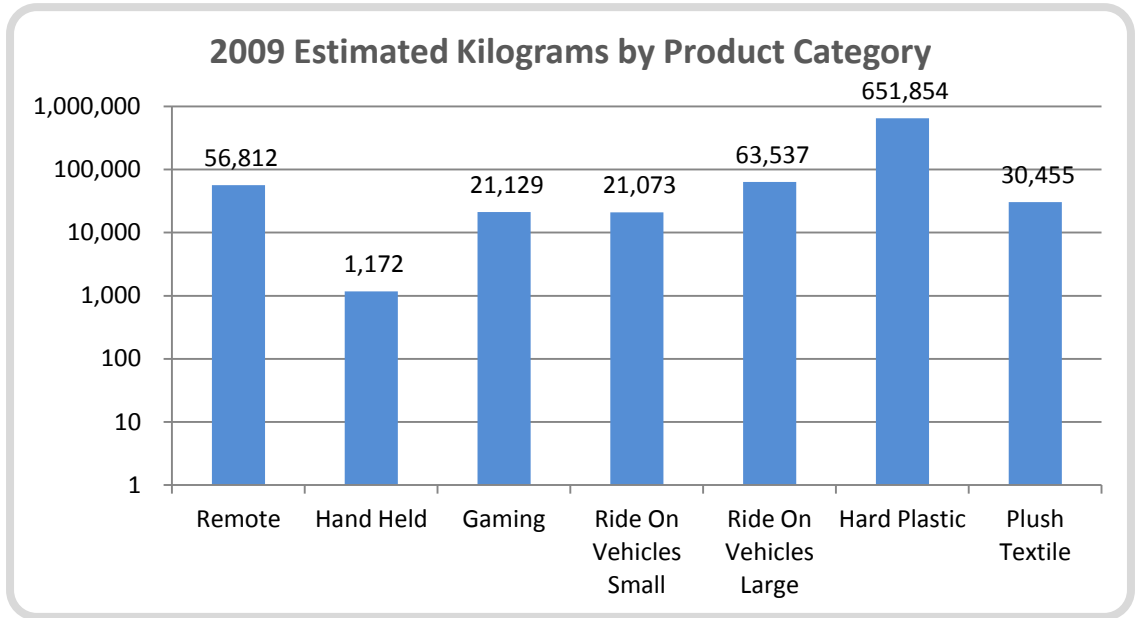
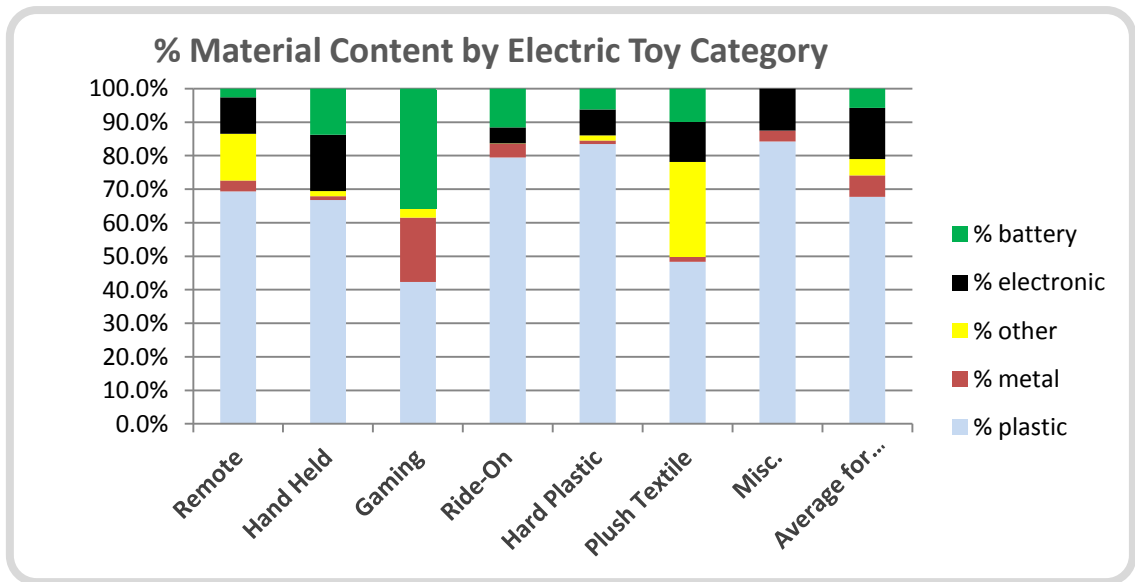


Chart 3: Material Content of Electronic Toys (results from Pilot Project)



The lack of industry life cycle information and the absence of other stewardship programs, the CBRSC concluded that there is no credible data or information on expected recovery rates for Electronic Toys.

The pilot project was successful in determining the types of Electronic Toys that will be recovered and the necessary collection, transportation and processing logistics needed for Electronic Toys.

Section 3: Proposed Operations

3.1 Collection, Transportation and Processing

The following sections outline the intended Collection, Transportation and Processing systems for Electronic Toys.

3.1.1 Collection

The Electronic Toys program will use a combination of the following methods to recover electronic toys:

- permanent return collection facilities voluntary events at retail locations, schools and malls as appropriate;
- temporary collection facilities (e.g., “Depot in a Box”) for rural communities;

The electronic toys collected will feed into strategically located depots in the major centres on Vancouver Island, Lower Mainland, Okanagan, Prince George and the Peace River. A variety of contractors, transporters and processors that will be used within the network as necessary.

3.1.2 Transportation

The Electronic Toys Program intends to utilize contracted transport resources to operate the program. Contracted transporters will meet all regulatory requirements and will maintain qualifications under a rigorous vendor management system.

Because the components of Electronic Toys do not trigger the transportation of hazardous waste as defined by the Environmental Management Act, no hazardous transportation provisions will be required for unwanted Electronic Toys.

3.1.3 Processing

One of the key findings during the development of the Stewardship Program and the running of the Pilot Project was that:

- modern Electronic Toys must be made of virgin plastic with minimal recycled content to prevent brittleness and no chance for contamination – this is a regulated requirement;
- plastic will be the primary commodity (by volume and weight) recovered from electronic toys; and,
- the majority of recovered plastic in the pilot project was from low end, orphan toys that have a variety of unknown plastic types (no recycling labels on product).

Based on these findings, it is clear that the recovered plastic from Electronic Toys cannot be recycled into new Electronic Toys, so a closed looped recycling system is not possible.

In addition, it is clear that there is no way to identify and sort the plastic types so the best possible outcome from the disassembly process is a mix of plastic types that, at best, may have some limited (low-grade) recycling applications. When the Stewardship Program starts, the CBRSC will investigate if these low-grade recycling applications are viable.

If there are no available recycling applications, then the only solution for the mixed plastics will be energy recovery. Energy recovery is very different from incineration and energy recovery is a valid option within the Pollution Prevention Hierarchy.

The processing options and fate of recovered commodities for electronic toys is summarized in Table 4. Note that landfilling and incineration are not desirable options for recovered commodities. The commodity recovery target for Electronic Toys is 95%.

Table 2: Processing Options and Fate of Recovered Commodities

Product Category	Processing Options	Fate of Recovered Commodities
Electronic Games	Manual disassembly followed by mechanical processing and material separation of commodities	Recovered metals smelted and used into new products
Internal Circuit Boards	Manual disassembly followed by mechanical separation of commodities	Recovered metals smelted and used into new products
Fabric from Plush Toys	Manual separation from other materials	Fabric sent for Energy Recovery
Batteries (Alkaline and Lithium)	Manual removal followed by mechanical processing	Recovered metals (Fe, Zn and Li) smelted and used into new products. Recovered carbon sent for Energy Recovery
Cables & Wires from Electronic Games	Mechanical processing	Recovered metals smelted and used into new products Plastic covering sent for Energy Recovery
Plastic	Manual disassembly followed by bailing	Low-value recycling or generation fuel through hydrous pyrolysis (R&D stage) or Energy Recovery
Other Ferrous and Non-ferrous Metals	Manual or mechanical processing	Recovered metals smelted and used into new products

The Electronic Toys ElectrThe Electronic Toys program intends to utilize BC and Canadian businesses for the primary dismantling and processing of electronic toys. All primary and secondary processors will be required to meet the CBRSC's Operational Controls. Commodities will be sold for the highest and best use depending on local and global markets.

3.2 *Operational Controls*

The CBRSC will develop Operational Controls for collection locations, events, transportation networks and processing facilities..

Electronic Toys do not meet the criteria of Hazardous Waste as defined by the Environmental Management Act/Hazardous Waste Regulation and as such, there are no regulatory storage or transportation requirements.

There are several Occupational Health and Safety requirements that will need to be integrated into the Operational Controls for processing facilities. These OHS requirements will be reviewed for each jurisdiction and incorporated in the Operational Controls.

3.3 *Environmental Footprint*

The CBRSC intends to track the environmental footprint of its stewardship program by estimating the carbon footprint of the collection, transportation and processing of Electronic Toys.

Once the baseline information has been collected in the first year of the program, the CBRSC will benchmark the programs Environmental Footprint and develop strategies to minimize the environmental footprint of the collection and transportation and processing programs.

3.4 *Application of Pollution Prevention Hierarchy*

3.4.1 *Reuse of Electronic Toys*

The reuse of electronic toys for the CBRSC Stewardship Program provides several health, safety and regulatory challenges. First, there are varieties of health risks that stem primarily from the reuse of plush toys. These concerns include the spread of communicable diseases, bed bugs and head lice. Secondly, safety risks stem primarily through guaranteeing the used product still meets CSA or ULC or other safety standards.

Thirdly, and most importantly, toys are regulated in by the Canada Consumer Product Safety Act and the Toy Regulations (www.gazette.gc.ca/rp-pr/p2/2011/2011-02-16/html/sor-dors17-eng.html). Because toys are used by children that do not have the cognitive ability to assess the associated health and

safety risks of toys, the Toy Regulations provide very stringent health and safety requirements that would apply to used toys collected by the CBRSC.

In conclusion, the CBRSC (on behalf of its members and the Canadian Toys Association) has a fiduciary responsibility to ensure that all Federal regulatory requirements are met if unwanted electronic toys collected by the program are reused by children. As such, the CBRSC cannot be involved in any reuse programs that do not conform to the Canada Consumer Product Safety Act and its regulations. While the CBRSC cannot participate in these reuse programs, the CBRSC will not refuse any unwanted electronic toys generated by those organizations that undertake reuse programs for used Electronic Toys.

3.4.2 Fate of Commodities

In all cases, electronic toys will be disassembled and the commodities recovered in their purest form in order to maximize commodity values

The CBRSC will use the Pollution Prevention Hierarchy and where possible, Zero Waste processing, to ensure that the recovered commodities have the highest and best use. The commodity recovery rate for electronic toys is targeted to be 95%

Recovered commodities will be moved up the Pollution Prevention Hierarchy depending on the recyclability of the material. A challenge identified in the Electronic Toy pilot project is that a high percentage of orphan electronic toys have low quality, non-identifiable plastics and the only option on the P2 Hierarchy is energy recovery.

3.4.3 Collection, Transportation and Processing

The environmental footprint of the collection, transportation and processing components of the stewardship plan are also important in the design of an environmental program.

The CBRSC will use the Pollution Prevention Hierarchy to guide decisions relating to the environmental footprint of the collection, transportation and processing of electronic toys.

Initially, the CBRSC will focus on GHG emissions and the Pollution Prevention Hierarchy will be used to guide program decisions that will lower the GHG footprint of the collection, transportation and processing aspects of the program.

3.5 *Monitoring and Auditing*

During the CBRSC's consultation with Producers, one of the key needs was access to the recovery data and being able to perform timely analysis about environmental, social and economic performance. The CBRSC intends to employ data and analysis tools to provide insight to develop and execute sustainable strategies.

In addition, the CBRSC will develop customized internet based “dashboards” to help understand and continuously monitor and communicate the status of the program. The dashboards will provide recovery and recycling information about all aspects of the recovered Electronic Toys. The dashboards will be posted on the CBRSC web site.

Finally, the monitoring program will include the inspection of the various collection facilities, transportation networks and processing facilities using a risk management hierarchy.

3.6 *Funding*

3.6.1 Administration Fees

The CBRSC will utilize a base fee costing for Producers within the Stewardship Program that covers program administrative costs.

3.6.2 Processing Fees

The operational costs of collection, transportation and processing of Electronic Toys will be fully funded by members of the Program. Where possible, the CBRSC tries to use the following criteria when establishing a fair cost structure system:

- 1) weight;
- 2) volume;
- 3) ease of dismantling;
- 4) hazard rating of materials;
- 5) value of recovered commodities.

The establishment of program costs for Electronic Toys has been challenging. While the CBRSC’s criteria are inherently appropriate at an academic level, many criteria do not apply to Electronic Toys. As an example, Electronic Toys are intentionally designed to be difficult to disassemble to prevent children from modifying the toy or creating a small parts and/or choking hazard.

In addition, the hazard rating of the materials is irrelevant as the Electronic Toys are required to be made from non-hazardous virgin materials.

Finally, the value of recovered commodities is not relevant as the pilot project demonstrated that low quality plastics from orphan products has no relevance to the value of commodities used in new Electronic Toys.

The CBRSC and the CTA will continue to work on the application of these criteria as they finalize the program costs for the products. Future enhancements of the program will include incentives for environmentally designed products.

Producers will be obligated to pay the program costs starting July 1, 2012 and program costs will be negotiated between the Producers of Electronic Toys and the CBRSC as the Stewardship Agency.

Costs associated with management of returned or orphan products will be borne by the members in this Stewardship Program. Costs associated with the management of obsolete or recalled products will be the responsibility of the Producer.

Activities in advance of program cost collection (such as developing the plan, establishing the collection network, assessing qualified processors and developing the communication strategy) will be initially borne by the CBRSC and then repaid from future program revenues from Electronic Toy Producers.

Non-CBRSC Member Electronic Toy Producers with product currently in the market place will be responsible for paying retroactive fees back to the start date of the Stewardship Plan plus any membership fees required by the Canadian Toys Association. New Electronic Toy Producers who have no history of selling toys in British Columbia will not be charged retroactive program costs.

3.6.3 Reserve Fund

The Electronic Toys Program proposes to accrue a reserve fund. The amount of the reserve fund will be determined by the Board of Directors.

The reserve fund allows for stability of program funding in case of sale decreases, volume increases, fluctuations in operational costs or reduced revenue in the event that commodity prices decrease.

Section 4: Proposed Strategies & Actions

The strategies and actions for Electronic Toys are designed to implement the program and then continually improve and expand the program. Because electronic toys have never been stewarded in North American, this program will use the first two years to develop and refine a cost effective, efficient and Province wide recovery program. The remaining 3 years will focus on refinement of the program.

The CBRSC will use five strategies in the first five years. The strategies and their actions are:

4.1 Administration and Management

The goal of this strategy is to develop a program that is efficient and cost effective that minimizes costs to the consumer.

Pre-launch

- Establish data management systems, audit protocols and firewalls so that market share data and information is protected;

- Develop electronic reporting systems for retailers;

Year 1 Actions:

- Conduct collection material analysis to ensure all producers are participating in the program;

Years 2-5 Actions:

- Review costs of collection, transport and processing costs to generate efficiencies;
- Review options to up move recovered materials up the P2 Hierarchy;
- Review fee categories and definitions to ensure that they fairly represent the materials being collected and fees promote DFE;
- Promote “design for the environment” with CBRSC members.
- Set targets for next 3 years and provide these in a letter to the Director.

4.2 *Comprehensive Collection Network*

The goal of this strategy is to provide the public with a well-run network of collection options.

Pre-launch

- Develop operational controls and audit protocols for the collection and processing network;

Year 1 Actions:

- Establish initial collection network using a depot network and set targets for next four years (ref. Table 3);
- Develop event programs for rural communities with input from the Regional Districts, developing targets for next four years.

Year 2 Actions:

- Increase size of collection network to ensure entire province has basic coverage based on targets set in year 1;
- Audit existing return collection and processing facilities for compliance to operational controls;
- Expand event days to compliment depot network.
- Set targets for next 3 years and provide these in a letter to the Director.

Year 3 through 5 Actions:

- Expand network of collection and event days to ensure rural areas have basic coverage based on targets set in year 1;
- Evaluate and assess rate of collection, determine barriers that still exist and develop plan to capture remaining amount of backlog;

- Conduct collection site operator satisfaction survey and address any issues as well as waste audits to determine effectiveness.

The targets for Return Collection Facilities and Events for the first 5 years are summarized in Table 3.

Table 3: Return Collection Facilities and Events

	Permanent Locations	Events	Rural Events
Year 1	32	4	20
Year 2	38	6	30
Year 3	42	8	40
Year 4	46	10	50
Year 5	50	12	60

4.3 Environmental Footprint

The goal of this strategy is to minimize the environmental impact of the products through product design, collection, transportation and processing.

Years 1 & 2 Actions:

- Develop metrics and baseline data for impacts of program;
- Analyse and track GHG impact.
- Set targets for next 3 years and provide these in a letter to the Director.

Years 3 through 5 Actions:

- Publish program footprint and initiate sustainability initiatives to reduce GHG impact where possible;
- Evaluate effectiveness of program and develop reduction targets based on baseline after two years;

4.4 Consumer Awareness

Because the stewardship of electronic toys is a new and unique program, the CBRSC intends to undertake a comprehensive consumer awareness program.

The goals of this strategy are to have consumers:

- aware of the electronic toy program,
- understand the options for re-use and recycling; and,
- location of collection facilities or events

The consumer awareness will include:

- Consumer surveys to quantify the awareness of the program and the products included in the program;
- Identification of target audiences and the most effective method of communicating the awareness of the program;
- Facilitate the use of social networking and schools to drive awareness and the recovery of electronic toys.

Year 1 Actions:

- Conduct a consumer awareness survey in urban and rural areas of the province to establish baseline and report on the study findings in the first annual report; set and awareness targets for years 2-4
- Develop the communication strategy and materials for consumer outlets, depots and events;
- Implement the communication materials that would include a website, RCBC hotline and Recyclepedia, materials for point of return, and materials at point of sale.

Year 2 Actions:

- Achieve a consumer awareness target improved by 10% over Year 1 baseline by end of the Year 2
- Repeat consumer awareness survey to ensure target improvements are achieved over Year 1 baseline;
- Review and modify communication strategy based on experience and Year 2 consumer awareness survey results;
- Reset Target awareness goals to achieve improvements in years 3 through 5 based on rate of collection and collection targets.
- Set targets for next 3 years and provide these in a letter to the Director.

Year 3 through 5 Actions

- Repeat consumer awareness survey in Years 3 and 5 to ensure annual consumer awareness target improvements are met;
- Prepare annual communication strategy based on previous years successes and most recent consumer awareness survey results;
- Integrate recycling information into Producer advertizing programs

4.5 Other Program Performance Measures

The goal of this strategy is to develop, monitor and report the Performance Measures as outlined in the Stewardship Plan that provides meaningful and timely data and information to Producers and consumers.

Year 1 Actions:

- Refine data management systems, audit protocols and firewalls so that market share data and information is protected (same as Section 4.1)

- Start the development of performance criteria once baseline data has been collected;

Year 2 Actions:

- Set targets for next 3 years and provide these in a letter to the Director.
- Start the development of dashboards for performance criteria as specified in Section 3.2 herein and Section 6 of the CBRSC Stewardship plan;
- Integrate dashboards into website for Electronic Toys.
- Set targets for next 3 years and provide these in a letter to the Director.

Year 3-5 Actions:

- Evaluate effectiveness of dashboards and expand so that consumers can track their products through the collection, transportation and processing program.

4.6 *Dispute Resolution*

There are three dispute resolution stages utilized by the CBRSC to resolve differences between two parties.

First Stage:

The first stage is to encourage the two parties to come to a fair resolution of the issue. Should any one of the parties be unsatisfied with the outcome of this stage, they must provide in writing to the CBRSC that the first stage of the dispute resolution procedure has not been successful.

Second Stage:

The CBRSC will take an active role in the mediation between the two parties. During this stage, the two parties will have an opportunity to describe the problem to the CBRSC and the CBRSC will generate options and a recommendation for consideration by the two parties. Should any one of the parties be unsatisfied with the outcome of this stage, they must provide in writing to the CBRSC that the second stage of the dispute resolution procedure has not been successful.

Third Stage:

In the event that no resolution has been reached, the CBRSC will appoint a qualified mediator or an arbitrator under the Commercial Arbitration Act. The mediation costs will be borne equally by the two parties.

In the event that the CBRSC is a party in the dispute, then Stage 2 would be bypassed because the CBRSC is a party in the dispute.

Section 5: Stakeholder Consultation

Consultation of the Electronic Toys Stewardship Plan included stakeholders internal and external to the Stewardship Program. The internal consultation included several meetings of brandowners within the Canadian Toy Association plus some retailers that will be involved with the implementation of the program at the consumer level.

The external consultation had three main elements. The first element was the posting of the draft stewardship plan on a variety of websites and encouraging stakeholders to review and provide written comments. The stewardship plan was posted on the CBRSC, the RCBC and the BC MoE websites combined with press releases and email notifications through various organizations (e.g., RCBC, Coast Waste Management, BC Product Stewardship Council etc). The second element includes the opportunity to attend a regional meeting in Prince George, Kelowna, Surrey and Victoria. The CBRSC collaborated with the Canadian Battery Association and held joint public meetings as a strategy to increase stakeholder participation. The third element was a webinar for participants in rural communities as well as out-of-province stakeholders.

Because the Stewardship Plan proposes visible eco-fees at the point of sale for the consumer, the consultation included direct outreach to the general public. A province wide advertisement was made through Black Press in their publications that reached 98% of British Columbians.

The stakeholder participation and input to the Electronic Toys Stewardship Program was comprehensive and broad based. Regional Districts representing both urban and rural parts of the Province were strongly represented throughout the consultation process. Private industry and other stewardship programs that may have overlap with the CBRSC also participated in the consultation. The webinar was well attended and there were three detailed written responses to the draft posted on the websites. See Appendix 1 for a complete list of participants, the issues and the responses.

There were five areas where the consultation has influenced the direction of the Stewardship Plan.

Rural Areas

The first and most important issued discussed in the consultation was the need to review the draft guidelines prepared by the BC Product Stewardship Council and

ensure that the Regional Districts that represent the rural parts of the Province are included early in the implementation of the Stewardship Plan.

There is a natural tendency for Stewardship Programs to focus on urban areas so that the program can maximize their recovery volumes.

Based on the input from stakeholders, the CBRSC has adjusted the implementation of the Stewardship Plan to ensure that Regional Districts in rural areas will have a higher profile and that a collection program will be established in each Regional District within the first 18 months of the implementation date in line with the PSPCA rural area guidelines.

Reuse

The second issue was reuse of electronic toys. While the CBRSC embraces the concept of reuse as an important management outcome for recovered products, toys used by children are one of the most regulated consumer products in Canada.

Because the brandowners of Electronic Toys are signatories to the CBRSC Stewardship Plan, the CBRSC is bound to the same regulatory constraints as its member brandowners.

As such, the CBRSC cannot be involved in any reuse programs that do not conform to the Canada Consumer Product Safety Act and its regulations. However, the CBRSC acknowledges that some organizations will continue to reuse and resell Electronic Toys and the CBRSC will not refuse any unwanted electronic toys generated by those organizations.

Plastics:

The third was the use and management of the plastics in Electronic Toys. One of the key findings of the Electronic Toys pilot project and consultation was that:

- plastic will be the primary commodity (by volume and weight) recovered from electronic toys;
- modern toys must be made of virgin plastic with minimal recycled content to prevent brittleness – this is a regulated requirement because toys are used by children;
- the majority of recovered plastic was from low end, orphan toys that have a variety of unknown plastic types (no recycling labels on product); and,

Based on the pilot project and consultation, it is clear that the recovered plastic cannot be recycled into new electronic toys, so a closed looped recycling system is not possible. In addition, it is clear that there is no way to identify and sort the plastic types so the best possible outcome is a mix of plastic types that, at best, may have some limited (low-grade) recycling applications. If there are no available recycling applications, then the only solution for the mixed plastics will be energy recovery.

Energy recovery is very different from incineration and energy recovery is a valid option within the Pollution Prevention Hierarchy.

The Stewardship Plan was changed to include low-grade recycling applications as a first choice and if that outcome is not available, there are two energy recovery options that will be investigated. First is a substitute for fuel to generate electricity or run industrial processes (e.g., cement kilns). The second is an emerging technology that turns low-grade mixed plastics into diesel (this technology is experimental and may not be applicable to plastics from electronic toys).

The CBRSC recognizes that some of the intrinsic value of the plastic will be lost should energy recovery be the only viable solution for the mixed plastics. However, the CBRSC recognizes that as the orphan products are removed from the program, higher quality plastics in modern electronic toys will be collected and other recycling options may become available. However, unless Federal regulatory standards are relaxed for electronic toys, the CBRSC is confident that recycled plastics will never be recycled into new Electronic Toys.

Program Costs

The CBRSC developed the following five criteria by which to establish program costs

- 1) weight;
- 2) volume;
- 3) ease of dismantling;
- 4) hazard rating of materials;
- 5) value of recovered commodities.

While the criteria are inherently appropriate at an academic level, many criteria do not apply to Electronic Toys. For example, Electronic Toys are designed not to be dismantled because children can modify the toy and the pieces can create a hazard to the child (e.g., choking hazard).

In addition, the hazard rating of the materials is irrelevant, as the Electronic Toys are required to be made from non-hazardous materials.

Finally, the value of recovered commodities is not relevant as the pilot project demonstrated that low quality plastics of orphan products produces a very poor quality mixed plastic that has limited or no value as a commodity.

The CBRSC and the CTA will continue to work on the application of these criteria as they finalize the eco-fees for the products.

Cross-Over between Stewardship Programs

There was some discussion on how the CBRSC Stewardship Program for electronic toys will coordinate and cooperate with other stewardship programs – specifically the Stewardship Program for Electronic Toys specific to electronic computer games that will be managed by Electronic Stewardship BC and non-rechargeable batteries that will be managed by Call-2-Recycle.

There was a general agreement with ESABC that there could be crossover of products within the two programs and that there was a mutual respect for each program and that communication materials by the CBRSC would be focused on the products to be recovered by its Producers.

Further, the second largest material type recovered in the pilot project was non-rechargeable batteries. The CBRSC and the Rechargeable Battery Recycling Corporation of Canada and the two organizations propose to sign a Letter of Understanding that will be based on mutual cooperation and collaboration.

APPENDIX 1: Electronic Toys Public Consultation Record

Four public meetings were held in locations around the province. In attendance on behalf of CBRSC were Malcolm Harvey as the consultation coordinator and Colin McKean, consultant to CBRSC.

SUMMARY OF DISCUSSIONS

PRINCE GEORGE – MARCH 9 - In attendance:

Terry Burgess	Fraser-Fort George Regional District
Petra Wildauer	Fraser-Fort George Regional District
Janine Dougall	Bulkley-Nechako Regional District
Curtis Thompson	Battery Direct
Laurie Gallant	Kitimat-Stikine Regional District
Terri McClymont	REAPS (Recycling and Environmental Action Planning Society)
Teresa Conner	Ministry of Environment

Specific questions/comments/concerns:

Why are video game consoles and equipment included in the stewardship plan? Are these not in the ESABC plan?	<p><i>Response at the session: To ensure that older game equipment, which may not be considered computers, are captured.</i></p> <p><i>Further CBRSC response: CBRSC anticipates public confusion between the 2 plans and will attempt to work with other stewards cooperatively to solve these issues.</i></p>
What is the corporate membership of the CBRSC Board?	<p><i>Response at the session: The interim president is the Chair of the Canadian Toy Association's Environment Committee. Other interim members include Colin McKean.</i></p> <p><i>Further CBRSC response: Lyndall Fry of the Canadian Toy Association has been appointed President. It is anticipated that the BOD will consist of industry members and supplemented with advisory committees representing an array of business and environmental groups or associations</i></p>
Has CBRSC seen the document on rural delivery standards produced by the BC Product Stewardship Council and the response from the existing product stewards?	<p><i>Response at the session: No, but CBRSC would appreciate a copy if it can be made available</i></p> <p><i>Further CBRSC response – A copy has been received and reviewed. While the BC Product Stewardship Council's document is a draft, the CBRSC agrees with the spirit and intent therein.</i></p>
There are no firm commitments in the stewardship plan for what will be provided in rural areas.	<p><i>Response at the session: There needs to be more detail added to the plan for rural service levels at the outset of the program</i></p> <p><i>Further CBRSC response: We will work with the stakeholders, and potentially with other stewards, in rural areas during the implementation phase to ensure adequate coverage.</i></p>
How will the reuse issue be addressed?	<p><i>Response at the session: Due to the strict Federal regulations regarding toy safety, the stewardship plan cannot be directly involved in any reuse program but will encourage the donation of reusable toys to charities.</i></p>

	<i>Further CBRSC response: The Canadian Toy Association does not recommend donation of used toys. The toy industry has seen major regulatory changes over the last three years with regard to product design and content and these changes are ongoing. Based on the significance of these requirements, we cannot recommend that used products be donated. Toy industry members are active in charitable foundations and have long records of generous giving to address the desire to help needy children.</i>
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GENERAL DISCUSSION

Attendees explained the difficulties faced in rural areas where landfills are easily accessible, have no tipping fees and usually no staff, which makes dumping used products much more convenient than returning them to any other collection point. They also noted the lack of covered storage space at their landfill/recycling sites which makes it difficult for them to meet product stewards volume requirements for pickup.

Several areas have “swap sheds” or “share sheds” where citizens drop off materials for reuse but often these items are unusable and must be landfilled. The possibility of the CBRSC program providing a soft-sided bin for unusable electronic toys was discussed. An annual toy collection event in one area also ends up with a large quantity of unusable toys and a collection bin for this could be provided. The issue will be to arrange for regular and reasonably frequent collection along the Highway 16 corridor in cooperation with other programs to share the collection costs.

There was also discussion about the need for infrastructure in rural areas and whether the product stewards would assist in providing it. The response was that investment by product stewards in local government infrastructure was unlikely since most stewards already have commitments to contractors in the area.

A suggestion from the group was for the production of a map, for each regional district, which would locate all the facilities and events schedules for all the product stewards. This was seen as an overall initiative for all stewards and not specific to the CBRSC plan.

KELOWNA – MARCH 11

In attendance:

Al Stanley	Kootenay-Boundary Regional District
Paul Marois	Planet Earth Recycling
Meegan Armstrong	Ministry of Environment
Peter Rotheisler	Central Okanagan Regional District
Wendy Bennett	Okanagan-Similkameen Regional District

Specific questions/comments/concerns:

Rural collection systems are not specified in the plan and experience has shown that if not specific in the plan they are often sketchy in delivery	<i>Response at the session: There is a recognition that more specifics for rural areas are required Further CBRSC response: We will work with the stakeholders, and potentially with other stewards, in rural areas during the implementation phase to ensure</i>
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	<i>adequate coverage.</i>
Charitable donations for toys may be impacted if it is easier to drop off a toy for recycling than to donate it	<i>Response at the session: The program will encourage charitable donations of useable toys. Further CBRSC response: Charitable organizations must adhere to the same impactful regulatory changes that govern manufacturers of toys previously mentioned. Based on the significance of these requirements, we cannot recommend that used products be donated. Toy industry members are active in charitable foundations and have long records of generous giving to address the desire to help needy children</i>
Defective items returned to stores are often credited by the manufacturer to the retailer with instructions to dispose of the item. If the EHF has been refunded to the customer, the concern is that the steward will deem the product as not being part of the plan because the fee hasn't been paid.	<i>Response at the session: Where the fee has been paid by the brandowner to the program the defective item would still be covered. The electronic toy program would not refuse to take a defective item under these circumstances.</i>
Comment: The plan was complimented for its collection flexibility	
Comment: The plan must deliver what is promised. Some stewardship plans have not done so and are causing problems for the rest.	

GENERAL DISCUSSION

The regional district participants are looking to the Ministry of Environment for stricter guidelines and performance requirements for stewardship plans along with more stringent five-year reviews. (This last not specific to the CBRSC stewardship plan)

SURREY – MARCH 15 - In attendance:

Maury McCausland	London Drugs
Tracy Weldon	City of Burnaby
Dipak Dattani	City of Burnaby
Kim Day	Ridge-Meadows Recycling
Dan Wong	Stewards Edge
Peter Maurer	EnerSys Canada
Phil Blanchette	Phil's Batteries and More
Ted Taylor	Infinity Battery
Andrew Doi	Metro Vancouver Regional District
Buddy Boyd	Gibsons Recycling Depot
Teresa Conner	Ministry of Environment
Meegan Armstrong	Ministry of Environment

Pre-registered but not in attendance:

Joyce Thayer	Electronics Stewardship Assoc. of BC
Tyler Garnes	Encorp Pacific (Canada)
Kel Coulson	City of Burnaby
Bill Carey	City of Burnaby

Specific questions/comments/concerns:

What specific elements of the Waste Management infrastructure will be used?	<i>Response at the session: Specific elements will be determined following the approval of the stewardship plan. Further CBRSC response: DOWNSTREAM Sustainability Services will provide collection systems, transportation and administration</i>
Is there a seasonal pattern expected in electronic toy collection?	<i>Response at the session: Seasonality is a factor, for example, collection events at retail stores must take place before the end of October to avoid the run-up to Christmas. Further CBRSC response: Toy sales take place primarily during the last quarter of the year. Returns may follow the same pattern but will require experience to determine. Such trends will be closely monitored.</i>
Comment: A one-stop solution is preferred in rural areas.	
How will the program handle re-use?	<i>Response at the session: Strict federal regulations governing toys prevent a formal involvement by the program in re-use activities but the program will encourage continued re-use by others.</i>
What will be the extent of retailer's involvement in collections?	<i>Response at the session: Some retailers (e.g. London Drugs) do take back toys already. Further work is necessary to determine the extent of retailers' desire to get involved in collection.</i>
Comment: The incentives in the program (variable EHF levels) were cited as good encouragement for better design for the environment.	

VICTORIA – MARCH 17 - In attendance:

Denise Dionne	Capital Regional District
Wendy Dunn	Capital Regional District
Mike Hennessy	Tire Stewardship BC
Paul Shorting	Regional Recycling
David Lawes	Ministry of Environment
Lyn Smirl	Ministry of Environment
Phil Knudtson	Ministry of Environment
Kristi MacMillan	Ministry of Environment

Specific questions/comments/concerns:

What were some of the comments expressed in previous consultation meetings?	<i>Response at the session: The comments expressed above were outlined.</i>
Have there been any requests for the program to use local government infrastructure?	<i>Response at the session: There was some discussion as to how the product stewards might utilize local government infrastructure (transfer stations, etc.) in remote areas where the stewards don't have permanent facilities</i>
Comment: The Capital RD noted that they participate with most stewards through their facilities at the Hartland landfill.	
Could the program be used as a school fundraiser?	<i>Response at the session: There is opportunity for schools to participate through collection events.</i>

WEBINAR

A 1-hour webinar was held Wednesday March 23. Representing CBRSC were Malcolm Harvey and Colin McKean along with Lyndall Fry from the Canadian Toy Association (part)

Registrants

Nicole Kohnert	North Okanagan Regional District
Emy Lai	City of Richmond
Wendy Bennett	Okanagan-Similkameen Regional District
Brigitte Pronovost	
Cathy Kenny	Sunshine Coast Regional District
Coco Hess	B H Consulting Group
Manny Cheung	Product Care
Sue Maxwell	
Jay Illingworth	eStewardship
Katelyn Vaughn	EPSC
Abby McLennan	
David Blanchette	Battery Direct
Harmony Huffman	Cowichan Valley Regional District
Lyndall Fry	Canadian Toy Association

Specific questions/comments/concerns:

Concern that 75% of the material collected in the pilot program were mixed plastics of low quality with energy recovery given as the recycling solution	<p><i>Response at the session from CTA: Most of the collections at the pilot came from “one-off” manufacturers and the program will have to work through such orphan products in the early phases. The toy industry’s major producers are moving towards higher-grade plastics.</i></p> <p><i>From CBRSC: Energy recovery is an interim solution, the program’s goal is to move all materials up the Pollution Prevention hierarchy.</i></p>
Comment: Would like to see more information on plans for better materials and more detail on separation.	
Concern about program overlap i.e. gaming systems and batteries	<p><i>Response at the session: The regulation includes gaming systems in the toy category so they had to be included. There may also be old product that could be defined as a gaming system but would not meet the current standard of computer-based systems covered by ESABC’s program. Cooperation between all product stewards will be required to work out the details of these and other potential overlaps.</i></p>
Concern about coverage on the Sunshine Coast, one depot for electronics not considered enough	<p><i>Response at the session: Rural area servicing is being reviewed prior to plan submission.</i></p>
Will the program include collections through schools and thrift stores?	<p><i>Response at the session: Both methods are under consideration. Twelve of the 14 schools in the area of the pilot project wanted to participate in some way.</i></p>
What is a “depot in a box?”	<p><i>Response at the session: Can include small roll-off bin, rewards kiosk and a bagster for retail locations</i></p>

	<i>CBRSC: A self-contained unit that can be used at events.</i>
Will depots in a mall be unstaffed?	<i>Response at the session: Retail locations will be temporary, event-based not permanent and will not be inside stores. Likely in the parking lot. Work still needs to be done on retailer's degree of participation and timing of such events.</i>
Will a formal request for collection sites be issued?	<i>Response at the session: It will be a while yet but CBRSC has 80 names of interested parties none of which are existing bottle depots. CBRSC: We will solicit interested parties during the implementation phase.</i>
Will CBRSC be interested in participating with the Ecodepot concept being discussed by several local governments	<i>Response at the session: While product stewards may give consideration to individual sites they must also ensure that they do not contravene commercial agreements with, or jeopardize the viability of, their existing collection agents.</i>
Are the fees and lists of depots available?	<i>Response at the session: The program is not at that point as yet.</i>
Could waste analyses be used as a performance measure by product stewards?	<i>Response at the session: Product stewards have been approached about this and, while there has been discussion, no decision has been reached. It is most likely that, should stewardship agencies participate, it would be in a selected number of audits which would provide the basis for province-wide measurement</i>

WRITTEN SUBMISSIONS

Following the completion of the public meetings and the webinar, the following written submissions were received.

From Sue Maxwell – Received March 23, 2011

<p>Recommend this plan submission be reviewed solely on the Appendix, which is the true plan. The parent document is not relevant and while promising many positive things such as working towards zero waste, these promises are not reflected in the Appendix document. Each program should require its own plan unless the products are an addition to an existing program with identical collection and processing requirements.</p>	<p><i>The parent document and appendix must be considered together. As new sectors are added, the reason for the structure of the parent document will become more apparent.</i></p>
<p>Sections 1.1 and 1.3 make reference to members of the plan in Section 6, but Section 6 is blank. On the webinar, some member companies were noted. Are they to be added to section 6? What is being done to fill in this section?</p>	<p><i>Section referred to is actually Table 1. The largest producers were included in the first draft; additional companies will be added as they assign CBRSC as their steward.</i></p>
<p>While I appreciate the difficulty in showing the respective sales and weights in Charts 1 and 2, the use of a logarithmic scale is harder to interpret and could appear misleading. Perhaps these could be broken down into different charts for a clearer representation.</p>	
<p>Table 2 –did the pilot project look at the types of plastics and feasibility of separating them into different types? Did it look into the feasibility of recycling the different plastics?</p>	<p><i>The pilot project was used to develop some understanding of the types of plastics to be expected. Studies of collected materials from the first years of the program will be used to set recyclability standards.</i></p>
<p>3.1.1 –how will the communications distinguish between regular depots and depots in a box? It is often a challenge to get consumers and residents to know where depot locations are so if there will be a lot of changes around where service is offered, there will need to be significant communications work done and the communications noted so far in the plan do not seem adequate.</p>	<p><i>“Depot in a box” will be used where permanent depots are not feasible. With no permanent option, consumer confusion should be limited. Collection events will be properly targeted and advertised.</i></p>
<p>If the depots in a box are not staffed, what will happen with the non-program products?</p>	<p><i>All collected items will be treated appropriately avoiding landfill where possible.</i></p>
<p>“The electronic toys collected at the permanent return collection locations, events and “Depot in a Box” will feed into strategically located depots in the major centres on Vancouver Island, Lower Mainland, Okanagan, Prince George and the Peace River.” Is this referring to consolidation centre’s or are these the only actual permanent depots? If so, there needs to be far more permanent depots. Why so few permanent collection sites?</p>	<p><i>These are consolidation centre’s, not depots. Permanent sites are listed in Section 3.1.1 but, given the extreme seasonality of interest in toys, permanent locations may not be the best option for electronic toys.</i></p>
<p>Collection in malls is a good idea –who will run these?</p>	<p><i>Collection events at retail locations will be operated by experienced and qualified operators.</i></p>

<p>3.1.3 processing notes that landfilling and incineration are “not desirable options for recovered commodities” and sets a target for recovery of commodities of 95%, however the plan clearly states that it will be incinerating most of the material (plastics). The discussion of highest and best use is clearly contrary to burning materials which is at the lower end of the pollution prevention hierarchy. Recovery of a commodity means that you actually recover that material and put it back into circulation, not that you burn it. In burning, you may recover some energy (though not anywhere near what the embodied energy represents) and possibly some metals but you are not “recovering “ the commodity of plastic –you are burning it. Statements like this should be removed from the plan as they are false. The plan should be honest about the challenges it faces around recycling of plastics (as discussed in the webinar today) and should provide clear action steps about how the program plans to move up the pollution prevention hierarchy.</p>	<p><i>Energy recovery is not incineration and the primary focus is to avoid landfilling electronic toys. Early stages of the program will have to deal with undifferentiated plastics that may become less of a problem as newer products with identifiable (recyclable) plastics start to be returned.</i></p>
<p>3.3 Carbon footprint –make sure it includes the loss of embodied energy through burning of materials</p>	<p><i>Analysis will based on LCA principles.</i></p>
<p>3.4 Aside from a focus on children and social networks, what other communications tools will be used. There needs to be more than just these. What about the use of RCBC as an information hub?</p>	<p><i>See Section 4.2 of Appendix 1 for RCBC involvement</i></p>
<p>3.5 There should be clear statements about what measures will be used for the program (ex. number of tonnes collected, number of tones of materials recycled, number of tonnes to materials burned, number of collection sites, etc). There is no clear and transparent listing of these items.</p>	<p><i>There are no comparable programs for electronic toys on which to make more accurate estimates at this time.</i></p>
<p>3.6.2 Processing fees. Are the processors willing to provide costing based on value of materials and ease of dismantling specific to the categories (as this has not been easy to get in the past)? Also if previous statements in the plan note there are not hazardous materials, where does that hazard rating of materials come into play?</p>	<p><i>Yes, processing fees will be based on the value of materials and the ease of dismantling but, due to orphan products, this will have to be reviewed annually. Hazard comment is in main body of the plan which must deal with all expected materials. References to hazardous materials in the Appendix for electronic toys will be removed.</i></p>
<p>3.7.1 Will there be reuse or not? It is not clear as there seems to be conflict between various sections of the plan.</p>	<p><i>Federal regulations regarding toys effectively prohibit official involvement of CBRSC (operating on behalf of CTA) in reuse.</i></p>
<p>3.7.2 This statement is patently false and shows a clear lack of understanding of what zero waste is: The CBRSC will use the Pollution Prevention Hierarchy and Zero Waste processing to ensure that the recovered commodities have the highest and best use. The commodity recovery rate for electronic toys is anticipated to be 95%”. Similar to number 9 above, if a high percentage are low value plastics, what about the percentage that is not? What about developing systems to recycle the low-value ones? Are they really non-recyclable or just difficult (if</p>	<p><i>Section 3.7.2 will be changed to focus on recovered materials. Recovered materials will be moved up the PP hierarchy where possible. Research is being conducted to determine the highest and best use for low quality, unidentifiable plastics from orphan products.</i></p>

so, develop a plan for them and commit to it in the plan)	
3.7.3 –these three statements do not make sense together. Is it just the pollution prevention hierarchy or also the environmental footprint (which is more than just the GHG and PP hierarchy) or a step wise approach.	<i>The PP hierarchy is flexible enough to be applicable to the program itself in addition to the products handled. The PP hierarchy was originally developed for industrial processes and was adapted for use in product stewardship.</i>
4.1 –why just retailers reporting –are there no producers (as defined by the recycling regulation) at all in BC? Promoting DfE is great –how will that be done?	<i>Section referred to does not contain mention of retailers but, as yet, no producers in BC (as defined in the regulation) have been identified. DfE is an on-going activity of all producers but toys have additional regulatory constraints limiting such things as ease of disassembly.</i>
4.2 Consumer awareness –it seemed as if the program would not be doing anything around reuse from the earlier sections so what would a consumers option for reuse be? If there is one, it should be added into the earlier section. If there is going to be a communication strategy, this should be mentioned in the consumer awareness section. Year 2 actions talk about meeting targets –what are those? Are they set now or will they be set and on what basis? Why are many of these actions and strategies not mentioned in the consumer awareness section 3.4.	<i>See comments on reuse above. Targets will be determined when sufficient data is collected.</i>
4.3 the network should be expanded much more quickly than is in the plan –major cities (unless defined as cities with over 4,000 population) are not adequate for the first year –the program needs to be pursuing collection sites in smaller cities in year 1. Not sure what “backlog” should exist after year 2 – perhaps better described as material still going to landfill/incineration not through the program.	<i>As noted above permanent sites may not be the best option. This is especially true in rural areas and comments from those areas have been taken into consideration in the plan.</i>
4.4 The goal of this section will not be achieved through these actions.	
4.5 This mentions performance measures that are outlined in the plan but none are noted in this section (and it would take a very close reading of the plan to list out any committed measures). The concept of the dashboard is nice but the plan should outline which measures will be reported on (that are known right now) and which ones will need to be assessed. There should be mention of the measures which are standard for existing programs and which the Ministry of Environment has been developing.	<i>Performance measures are in the main plan and will be adapted to the program for electronic toys. The dashboards will provide very current information on program activity as the data is collected.</i>
Section 5. Public consultation is a requirement irrespective of whether visible fees are a part of the program or not.	
There are a lot of good intentions in this plan but very few of them are reflected in the actual plan in terms of actions, commitments, timelines and acknowledgement of key problem areas. Also many spelling and grammatical errors show a plan that needs to be edited to provide a cohesive, well thought out, well edited strategy. The focus should be stewardship, not	<i>The primary focus of the regulation is to avoid landfilling of materials and the plan was developed to meet that requirement.</i>

recovery.	
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From Andrew Doi, Metro Vancouver Regional District, received April 11, 2011

<p>Overall Comment: The basic framework of this program sounds good, however greater detail in the program specifics would be helpful for stakeholders. That said, the challenge of creating a first-of-its-kind program is recognized.</p>	
<p>Typo: pg 12; section 3.2; third paragraph; first sentence; "...requirements that will need to integrated into..."</p>	<p><i>Corrected</i></p>
<p>Electronic Toys Market (Pg. 5): The sales market for toys is clearly seasonal, but what about the timing of end-of-life disposal? Does it follow the same pattern?</p>	<p><i>From feedback received during consultation it appears that there is also a seasonal pattern to toy collection (e.g. charitable collections for Christmas). If verified, this may affect the pattern of collections for the program.</i></p>
<p>Electronic Toys Market (Pg. 5): Given the shorter life-cycle, and the reduced use of toys at younger ages, improved product design will be a critical success factor for this sector. It would be interesting to hear the details about how design changes are being integrated into the process.</p>	<p>The toy industry is an innovative industry. Changes in laws on material substances and improvements in designs using new materials and technologies is fundamental in toy company deployment of product design and development.</p>
<p>Proposed Operations (Pg. 11): Commodity recover target of 95% is great. Continual reporting on performance towards this target would be very helpful.</p>	<p><i>The program is committed to regular updates as information is gathered.</i></p>
<p>Funding (Pg. 14): Industry incentives for environmentally designed products are a great idea. More EPR programs should be doing this</p>	<p><i>The program will attempt to do this wherever possible but the need for operational simplicity may limit this option.</i></p>
<p>Application of Pollution Prevention Hierarchy (Pg. 15): Health/safety risks clearly influence the reuse of toys, but further research into reuse is justified.</p>	<p><i>The changes in chemical substance controls over the last three years is unprecedented in the history of toys. The outlook shows there will be additional activity over the next three years. Once the change pattern slows the review of reuse will be considered.</i></p>

From Cathy Kenny – Sunshine Coast Regional District – Received April 18

<p>The Sunshine Coast Regional District cannot stress enough the importance of ensuring adequate rural service levels for the Electronic Toys Stewardship program. We strongly recommend that service levels be based on population centre's rather than on distance and/or population. The Sunshine Coast has a population of approximately 30,000 comprised of three distinct centre's each with their own commercial, residential and industrial components. The Sunshine Coast highway which connects all of our communities is approximately 100 km from tip to tip. However, due to our challenging roads it takes three hours to do a round trip.</p>	<p><i>CBRSC will work with the stakeholders, and potentially with other stewards, in rural areas during the implementation phase to ensure adequate coverage.</i></p>
<p>A minimum of three drop off locations are required to adequately service the residents of the Sunshine Coast. One drop off should be located in each area—Gibsons, Sechelt and Pender Harbour. This reflects the draft Sunshine Coast Regional District Solid Waste Management / Zero Waste Plan recommendation that a resource recovery park/eco-depot be located in each of these three communities. We suggest that your program consider co-locating with other stewards/EPR programs in order to streamline things and provide a one stop drop opportunity.</p>	<p><i>As noted above permanent sites may not be the best option. This is especially true in rural areas and comments from those areas have been taken into consideration in the plan.</i></p>
<p>Regional landfill waste audits are recommended and should be one of the key performance indicators for the program. A formula for product stewards' support/funding of waste audits is essential and should be identified in the Plan.</p>	<p><i>Product stewards have been approached about this and, while there has been discussion, no decision has been reached. It is most likely that, should stewardship agencies participate, it would be in a selected number of audits which would provide the basis for province-wide measurement</i></p>
<p>The Sunshine Coast Regional District recommends that promotion be expanded to include print ads in local newspapers as well as the other options listed in the Plan. The addition of print ads is important due to the demographics in our community—we have many seniors and residents without internet access. A comprehensive communication strategy for electronic toys is recommended to reduce confusion and build on the strengths of all of the EPR programs.</p>	<p><i>Collection events will be properly targeted and advertised</i></p>