

TELUS Communications Company

BC Electronic Equipment – Stewardship Plan

October 2010



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1.0 Executive Summary

TELUS Communications Company (TELUS) has developed its own BC Electronic Equipment Stewardship Plan in order to adhere to the requirements set in the BC Recycling Regulation – Electronic and Electrical Product Category. As per the BC Recycling Regulation, a producer must submit a product stewardship plan in a manner and format satisfactory to the Director of the BC Ministry of Environment for the products within the product category that the producer sells, offers for sale, or distributes in British Columbia. 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. This plan will address 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.

This stewardship plan has been developed in response to the British Columbia Recycling Regulation of October 7, 2004 adding a schedule for electronics waste management in December 2008, amending it in December 2009. Specifically this Stewardship Plan addresses the electronic and electrical product category – July 1, 2010 – Section 2.1. This regulation specifies that a stewardship plan is required to show how the electronics industry (TELUS, taking the responsibility of a producer) proposes to account for full life cycle management of their equipment, including recycling and refurbishing for re-use.

2.0 Program Elements and Principles

2.1 Program Elements

TELUS has designed these program elements to ensure a robust program:

- Rental Return process for TELUS owned telecommunication equipment.
- Customer owned TELUS telecommunication equipment return process.
- Recovery process for electronic equipment used within TELUS.
- Recovery process for electronic equipment containing mercury.
- Recovery process for batteries used in telecommunication equipment and electronics.

2.2 Program Principles

This Stewardship Program supports the following objectives:

- Consistency with the twelve principles set out by the Canadian Council of Ministers of the Environment in the Canada-Wide Principles for Electronics Product Stewardship.
- Consistency with industry developed (Electronics Products Stewardship Canada) guiding principles.
- Fulfillment of TELUS' responsibilities for telecommunications equipment that we rent or sell in BC.
- Acceptance, as required, of orphan telecom electronics sent to TELUS that were not sold or produced by TELUS.
- Having open discussions with appointed agencies regarding any orphan type telecom electronic equipment.
- Recycling, refurbishing, or selling our equipment in a responsible manner that respects the environment and health and safety issues.
- Availability of program services to all areas of the Province.
- ISO14001 certification of electronics recycling vendors utilized by TELUS.
- Communication to our customers of recycling opportunities during the initial rental/sale of products offered for sale/rental by TELUS.

3.0 Products Included in the Program

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.

- Cordless and corded phones (wireline)
- Voice Over IP (VOIP) phones
- Global Positioning System (GPS) equipment
- Video and telephone conferencing equipment
- Batteries associated with these electronics

Internal use equipment utilized by TELUS is included in TELUS' Electronics Recycling Program. This equipment comprises only 5% of all TELUS telecommunication related equipment.

- Corded desktop phones
- Payphones
- Video and telephone conferencing equipment
- Batteries associated with these electronics

Please Note: Other types of equipment such as modems, routers, gateways, set top boxes and network equipment are not included in this plan and will be included in the 2012 regulatory requirements.

TELUS is committed to working with other programs and agencies such as the Electronic Stewardship Agency of British Columbia (ESABC) and Rechargeable Battery Recycling Corporation of Canada (RBRCC) to develop synergies between programs where required. If issues arise TELUS will address them in a timely fashion.

4.0 Collection, Processing and Disposition

4.1 Residential Customer Returns – Rental Equipment

Convenient rental return options for residential customers include Canada Post and/or TELUS Service Technicians. A TELUS residential customer making a change to their rental equipment service will be advised by TELUS Customer Care to utilize Canada Post to return the rented piece of equipment. Prepaid waybills (see Appendix B) are available at Canada Post retail outlets. In the event a TELUS Technician is installing new equipment at the customer's premise, the old equipment may be returned by the TELUS Service Technician via existing processes.

4.2 Business Returns – Rental Equipment

Convenient rental return options for business customers include Fedex and/or TELUS Service Technicians. TELUS Customer Care will arrange for Fedex to pick-up the rental equipment for return. In the event a TELUS Service Technician is installing new equipment at the customer's premise, the old equipment may be returned by the Technician via existing processes.

4.3 Disposition of All Rental Equipment Returns

Upon TELUS receiving the rental equipment it is tested. Working units are refurbished and restocked for reuse; defective units under warranty are returned to the manufacturer; defective units not under warranty that are beyond economical repair are recycled by TELUS' authorized electronics recycling contractor.

4.4 Customer Owned Equipment (Residential and Business)

TELUS customers are encouraged to return customer owned telecom equipment purchased from TELUS by mailing back the equipment to TELUS' returns service provider. Prepaid mailing labels (see Appendix C) are available on TELUS' website (www.telus.com/environment). In the event a TELUS Technician is installing new equipment at the customer's premise, the old equipment may be returned by the TELUS Service Technician via existing processes.

4.5 Batteries

4.5.1 GPON Batteries

TELUS' Fibre Optic network requires a back up battery to ensure that our customer's TELUS Home Phone service continues to work during a local power outage. This Gigabit Passive Optical Network (GPON) battery is one of the TELUS products accepted in TELUS' BC Electronics Stewardship Plan.

TELUS customers that purchase replacement GPON batteries to power TELUS customer premise telecom equipment have the option to return their old battery by mailing back to TELUS' returns service provider. Prepaid mailing labels including return instructions are included with the replacement battery (see Appendix C) and they are also available on TELUS' website (www.telus.com/environment). In the event a TELUS Technician is requested to install the replacement battery, the TELUS Service Technician will bring the old battery back to TELUS for recycling via existing returns process.

4.5.2 Consumer Batteries within Telecom Devices

TELUS customers returning TELUS rented or customer owned equipment will be instructed to not remove the battery but ship the equipment, battery included, to TELUS' returns service provider. The battery will be removed prior to processing the electronics and the battery recycled.

All batteries recycled will be sent to our 3rd party recycler, who will then forward the statistical information concerning battery recycling directly to RBRCC. TELUS is committed to working with RBRCC where required.

4.6 Internal Equipment

Depending on the nature or the use of the equipment, various types of equipment follow different processes/routes.

Internal Telecom and Electronic Equipment:

- Obsolete and/or surplus equipment is sent to TELUS Reverse Logistics. Equipment is triaged and follows a disposition process where it may be refurbished for redeployment; it may be sold for reuse (investment recovery); or as a last resort it may be recycled.

- Defective equipment under warranty is returned to the manufacturer.
- Defective equipment not under warranty is recycled.
- Damaged equipment is recycled.
- Leased equipment is returned to the vendor.

Electronics that contain Mercury:

- Electronics that contains mercury are sent to TELUS' authorized recycler.

5.0 Product Recovery Rates and Targets

5.1 Customer Premise Equipment (Rental)

CPE rental equipment comprises approximately 90% of all TELUS electronic and telecommunication equipment. Our target is to increase the recovery rate to 75+% over the next four years. Targets for rental equipment (above):

2011 – Customer Premise Equipment (Rental) Return Improvement Implementation Plan Development & Project Launch

2012 – 65%
2013 – 70%
2014 – 75%

Achieving these targets is dependent upon a number of factors including TELUS' ability to fund, develop, and deliver systems and other process changes to facilitate continuous performance improvement as well as the responsiveness of customers to TELUS' consumer awareness campaigns for CPE rental returns.

5.2 Sold Equipment

Sold equipment makes up approximately 5% of all of TELUS electronic and telecommunications equipment. As the recovery of this equipment is being introduced in 2010 we do not have a current recovery rate. Our target is to achieve a recovery rate of 75% in the next four years as our ability to track material (per the project mentioned above) is implemented. This target will be dependent on the responsiveness of customers to TELUS' consumer awareness campaigns for sold equipment.

5.3 Internal Use Equipment

Internal equipment makes up the remaining 5% of TELUS electronic and telecommunications equipment. TELUS has been proactively recovering our internal use equipment for many years. Our target is to achieve a recovery rate of 100 per cent over the next 4 years, by continuing to ensure that internal processes are in place and employee education and training is conducted. Achieving this target is dependent upon the responsiveness of TELUS' team members to internal education, training and awareness campaigns.

5.4 Strategy and Plan Review

If TELUS does not meet our targets listed in Section 5.0 -5.3, we will review and make improvements to our plan including our consumer awareness strategy.

6.0 Stakeholder Consultation

This plan was developed in collaboration with 15 different TELUS business teams, governmental representatives, non-profit and environmental groups, other stakeholders and the general public.

Public consultation was completed for the TELUS Electronic Equipment Stewardship Plan and was made up of two distinct phases that included the following:

- a. **Phase 1 Consultation: May 14th – June 14th, 2010**
 1. Submission of the draft plan to stakeholders (for example, internal business teams, local governments, and environmental groups) for their comments.
 2. On TELUS Website (www.telus.com/environment) – commenting option available on this site.
 3. On Recycling Council of BC Website
- b. **Phase 2 Consultation: June 10th, 2010**
 1. One conference call answering queries from our stakeholders.

The comments, questions and concerns received via email and the conference call are all summarized in Appendix I: Public Consultation Process Summary.

7.0 Consumer Education and Public Awareness

7.1 Call Centre Public Awareness

TELUS call centre representatives provide instruction to customers returning rental equipment to TELUS as well as recovery options for customer owned telecom equipment that was purchased from TELUS.

7.2 Website Education

TELUS' corporate website will provide information on the TELUS stewardship plan program elements. www.telus.com/environment (see Appendix F).

7.3 Yellow Pages™ Directories ecoGuide

Each 2010 Yellow Pages™ phone book has a new ecoGuide section that provides a local list of how to recycle various products. Included in this list is telecommunication equipment. www.eco.yellowpages.ca (see Appendices D & E).

7.4 Recycling Council of BC (RCBC) – Recycling Hotline

The program will participate in the Recycling Council of British Columbia's (RCBC) recycling hotline service by which consumers can contact RCBC operators during business hours and obtain information about disposing of the Program products.

7.5 TELUS Technician Awareness

TELUS technicians, through team member communication, are aware they are to accept TELUS rented or sold equipment from our customers for recovery.

7.6 Customer Outreach – 2010

Prior to our Customer Premise Equipment Product Launch in 2011, TELUS is committed to the following in 2010:

1. Call Centre Awareness – informing call centre representatives about the program and equipping them with the information necessary to advise customers of their equipment return options
2. TELUS Website – updating the website to contain information for residential and business customers wanting to return items
3. Yellow Pages (ecoGuide) – including appropriate TELUS equipment return information in this guide.
4. TELUS will participate in the RCBC Recycling Hotline service
5. TELUS Technician Awareness – informing our technicians about the program and TELUS' commitments to our customers with respect to equipment being returned.
6. TELUS Team Members Awareness – providing team members with current information regarding the return of electronic equipment in this plan.

8.0 Program Performance Measurement

The program will be managed through TELUS which will provide annual public reports outlining our performance and plans for continued performance. Due to commercially sensitive nature of our business, TELUS will report to the Ministry annually on the following:

1. Categories of equipment recovered
2. Equipment refurbished for reuse (by total weight)
3. Equipment re-sold for reuse (as – is condition) (by total weight)
4. Equipment Recycled (by total weight)

In addition, TELUS will report on performance and this will be measured via the tracking of materials deployed (rented and sold per year to customers) versus material that is returned and will be reported on as a percentage.

TELUS will work towards reporting their materials by Regional District in 2012.

9.0 Dispute Resolution

TELUS' contracts with our return service providers have a dispute resolution procedure incorporated into the contract language that includes procedures and timelines for action. If disputes occur with other agencies and/or stakeholders with regards to this program, TELUS will handle these disputes in a responsible, timely and respectful fashion. Any customer enquiries that cannot be answered by TELUS representatives or technicians will be escalated internally as required.

10.0 Designing for the Environment

10.1 *Product Life Cycle Management*

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 RFP's when selecting vendors.

10.2 *Pollution Prevention Hierarchy*

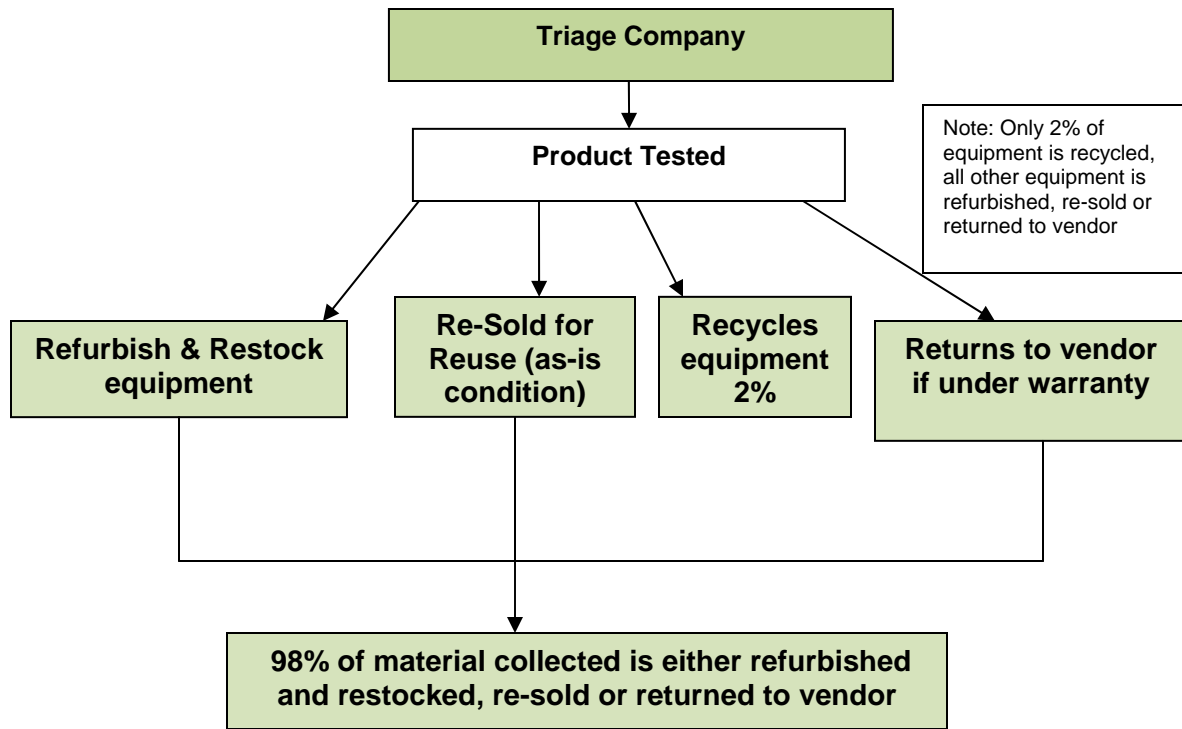
TELUS' triage of recovered equipment enables TELUS to follow the pollution prevention hierarchy, such as the regulation requires, to ensure pollution prevention is not undertaken at one level unless or until all feasible opportunities for pollution prevention at a higher level have been taken. All of the aspects of pollution hierarchy are achieved by TELUS through the following processes:

Reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency – Although TELUS is not a manufacturer of equipment, environmental considerations are important to TELUS when purchasing products. TELUS endeavors to work with our manufacturers to use minimal packaging, use FSC certified paper, utilize green components and consider additional environmental aspects when purchasing products. In addition, 98% of the items returned back to TELUS are refurbished, sold or returned to the vendor. This allows products to be reused rather than manufacturing new products from virgin materials.

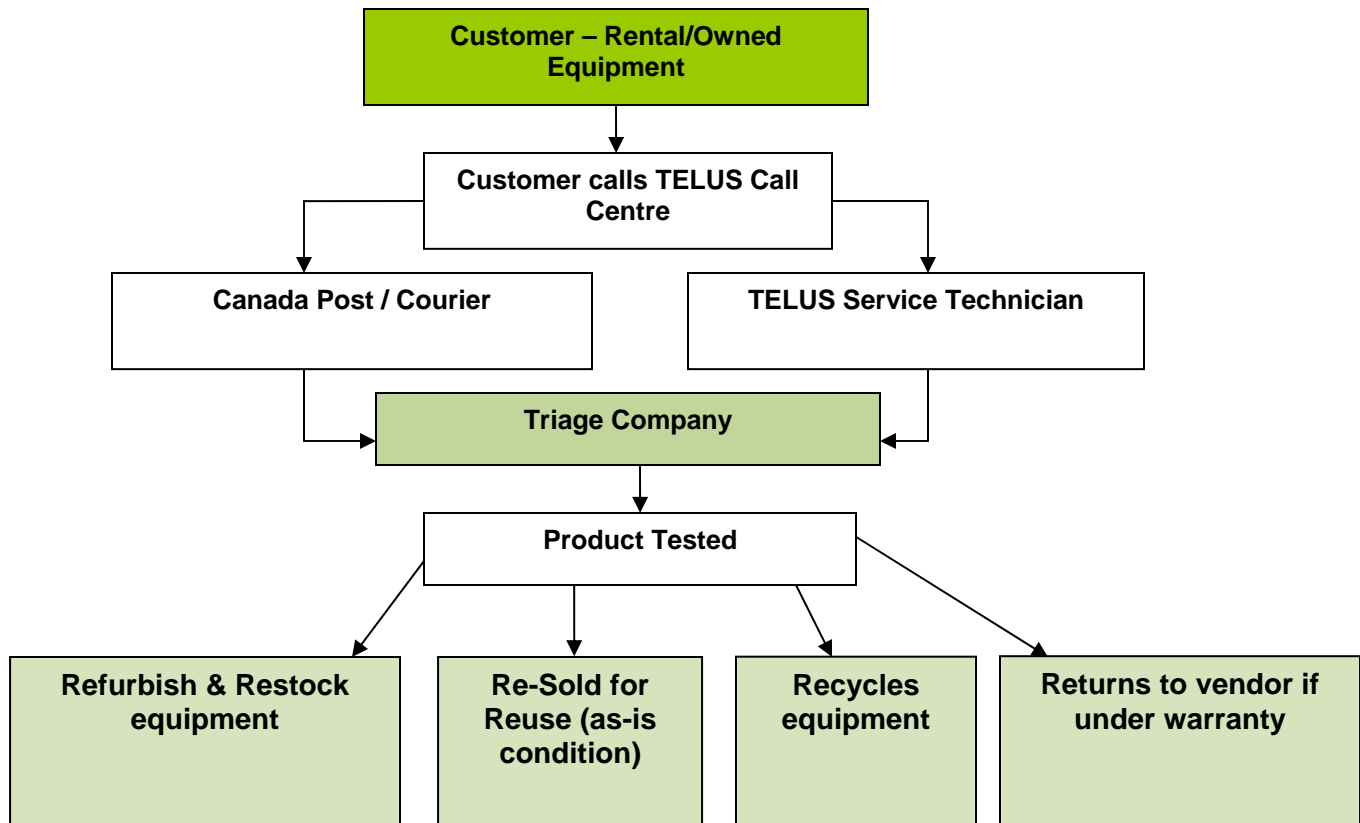
Redesign the product to improve reusability or recyclability - Although TELUS is not a manufacturer of equipment (TELUS branded or not) that we sell or rent, we endeavor to work with our manufacturers to encourage them when designing for the environment to use minimal packaging materials; FSC certified, 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.

Eliminate or reduce the generation of unused portions of a product that is consumable - During our triage process, in demand consumer products are evaluated to determine whether it is economically viable to repair the product. Those that are deemed beyond economic repair are harvested for reusable components thus reducing the requirement for purchasing new parts or new complete products. Any remaining unusable parts or housing is sent to our recycler where the components are further dismantled, then recycled.

Reuse, recycle and recover energy - By virtue of the triage system TELUS utilizes for its electronics, pollution hierarchy is considered throughout the process. All recovered items are reused where possible and recycling is used as the last resort. TELUS defines what items are to be refurbished for reuse; what equipment can be sold for reuse; what is to be returned to our vendor under warranty; and what products must be recycled. For example, only 2% of the total amount of customer premise equipment recovered is beyond economic repair and therefore is recycled. The other 98% was refurbished, sold or returned to vendor under warranty. The diagram below illustrates how the product is triaged and includes associated percentages.



Appendix A: Customer – Equipment Flow



Appendix B: Canada Post – Prepaid Way Bill: Rental Returns

The pre-printed information in red identifies the TELUS account with Canada Post. This should not be confused with the client's account information.

Client fills out the fields noted in light blue, and if they have been issued an RMA, it should be added to the "Sender's Ref." field noted in green.

From Expéditeur		Telephone No. N° de téléphone	
Customer No. N° de client		Agreement No. N° de convention	
SAMPLE ONLY			
City Ville		Postal Code Code postal	
To Destinataire		Telephone No. N° de téléphone	
TELUS 12345 ABC Road, Richmond,		BC	

CANADA POST / POSTES CANADA		EXPRESSPOST	
1			
908			
Bill of Lading		Connaissance	
Billed / Facturé	Paid by meter / Payé par compteur	Weight / Poids	Total Meter Amount / Valeur totale de l'impression
<input type="checkbox"/>	<input type="checkbox"/>		\$
Oversize/Unpackaged / Surdimensionné / Sans emballage		Mailing Tube / Tube d'expédition	Volumetric Weight / Poids volumétrique
<input type="checkbox"/>	<input type="checkbox"/>		kg
Sender's Ref. / Ref. de l'expéditeur	Client enters RMA number here (if applicable)	Declared Value for Coverage / Valeur déclarée pour couverture	
		\$	
Sender's Signature / Signature de l'expéditeur		Site No. / N° du bureau	
Accepted by / Accepté par		Date	
		Y A Y A Y A Y A M M D D	
FOR DELIVERY CONFIRMATION / POUR CONFIRMER LA LIVRAISON		www.canadapost.ca / www.postescanada.ca / or/ou 1 888 550-6333	
ITEM REFERENCE NO. / N° DE RÉF. DE L'ARTICLE		102412206	
		TA 023 150 445 CA	

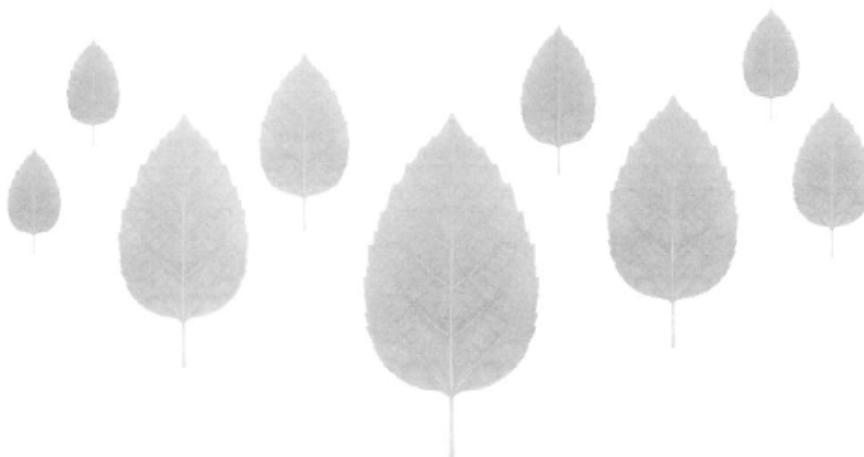
Appendix C: TELUS Prepaid Mailing Label - Purchased Products

UNDER DEVELOPMENT

From/Exp. : Name/Nom Company/Compagnie : Street/Rue City/Ville : Postal Code/Code postal :	Regular Parcel Return Service Colis standard Service de retour	3	Canada Post R P G P G Canada Post Canada Post Canada Post
To/Dest. :	c/o GEEP	L4N	RETURN RECEIPTS GUARANTEED COPIES OF RECEIPTS GUARANTEED
1396-632 (60-18)		Sender warrants that this item does not contain dangerous goods. L'expéditeur garantit que cet envoi ne contient pas de matières dangereuses.	

Appendix D: Yellow Pages™ eco Guide Listings TELUS Advertisement

TELUS Return & Recycle Program



Make the friendly choice.

Help protect the environment, by returning any old mobile phone or accessory from any carrier to a TELUS store. It's free and it helps reduce the waste that goes into our landfills, preventing hazardous materials from contaminating the soil and groundwater.

Visit telus.com/recycling for more information.



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Appendix E: Yellow Pages™ eco Guide Listings



Choose the appropriate solution

-  Municipal pickup service
-  Drop-off area – addresses listed on pages 20 and 21
-  Businesses – addresses listed in the Business Classified section of this Yellow Pages directory

G Electronics & Peripherals (cont'd)	G Electronics & Peripherals (cont'd)	G Electronics & Peripherals (cont'd)	H Tool/Disposal Household Waste
<p>G2</p>  <ul style="list-style-type: none">  Canadian Diabetes Association  Chubb Recycling Program – BC  Electronic Recycling Association  Free Geek Vancouver  Gather & Give  Richardson's Salvage Recycling Corporation – "Get 2 Recycle" Program  Salvation Army Thrift Stores  Apple Computer  Saksy's Direct  Bell Canada Stores  Best Buy  Canadian Tire Associated Stores  Costco Wholesale  H&M  HomeShop  Home Depot  Lander Group  Rogers/Wireless  Radio  Staples  Teds  The Box  The Source  Value Village  Zellers 	<p>G3</p>  <ul style="list-style-type: none">  Big Brothers of Greater Vancouver  Boys & Girls Club of Greater Vancouver  Canadian Diabetes Association (CDA)  Canadian Recycling Association  Free Geek Vancouver  Salvation Army Thrift Stores  Recycling Council of British Columbia  Value Village  Audible  Best Buy  Carson Books & Records  Future Shop  Replicon Records & CDs  Staples  The Source  Treasure Chests Thrift & Gift Shop  Value Village  Zellers <p> *Municipal pickup services accept music, movies & video games, at special conditions.</p> <p>G4</p>  <ul style="list-style-type: none">  BC Digital Divide – Computer Equipment Donation  BC Electronics Material Exchange  Computers for Seniors BC  Electronic Recycling Association  Free Geek Vancouver  Free Geek Vancouver  Regional Recycling Vancouver  Salvation Army Thrift Stores  Vancouver Central Return to Depot  Best Buy  Future Shop  HomeShop  Staples  The Source 	<p>G5</p>  <ul style="list-style-type: none">  Recycling Council of British Columbia  Salvation Army Thrift Stores <p>G6</p>  <ul style="list-style-type: none">  Big Brothers of Greater Vancouver  Boys & Girls Club of Greater Vancouver  Canadian Diabetes Association  Salvation Army Thrift Stores  St. Vincent de Paul (Society) – Value Stores  Best Buy  Future Shop  HomeShop  The Source  Value Village <p>G7</p>  <ul style="list-style-type: none">  BC Electronics Material Exchange  Canadian Diabetes Association  HomeShop Foundation  Monero's Central Committee Thrift Store  Salvation Army Thrift Stores  St. Vincent de Paul (Society) – Value Stores  Vancouver Reuses 	<p>H1</p>  <ul style="list-style-type: none">  Gascan pickup <p>H2</p>  <ul style="list-style-type: none">  Salvation Army Thrift Stores  St. Vincent de Paul (Society) – Value Stores  Value Village <p>H3</p>  <ul style="list-style-type: none">  Gascan pickup  BC SPCA Thrift Stores (Group) <p>H4</p>  <ul style="list-style-type: none">  Curbside Recycling  Regional Recycling Vancouver  Vancouver Central Return to Depot <p>H5</p>  <ul style="list-style-type: none">  Gascan pickup  Pacific Waste Objects  Fast & Ship  Packaging Depot <p>H6</p>  <ul style="list-style-type: none">  Best Buy – Bottle Depot  Recycle Centre – Paint Blue Objects  Recycling Council of British Columbia

For the online version, visit:

<http://Vancouver.YellowPages.ca>

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Appendix F: Website Education

Website Under Development: Once finalized, an example section from the website will be inserted here.

Appendix G: TELUS' Stakeholder List

- 29 Regional Districts
- Abbotsford-Mission Recycling Program
- ACES
- Alberni Environmental Coalition
- BC Ministry of Environment
- BC Product Stewardship Council
- BC Technology Industry Association
- Bulkley Valley Recycling Society
- Business Council of BC
- Call2Recycle – battery agency
- Campbell River Recycling Society
- Canadian Consumer Specialty Products Association of Canada
- Canadian Plastics Industry Association, West
- Canadian Wireless Telecommunications Association (CWTA)
- City of Vancouver
- Coast Waste Management Association
- Compucycle
- Corporation of Delta
- Delta Recycling Society
- Ecycle
- Electro-Federation Canada
- Electronic Recycling Association
- Electronic Stewardship Association of BC
- Electronics-Recycling
- ESABC
- FCM Recycling Inc.
- Food & Consumer Product Manufacturers of Canada
- Genesis Recycling Ltd
- Greater Victoria Ecological Network
- Hewlett-Packard
- Information Technology Association of Canada
- International Centre for Sustainable Cities
- Metro Vancouver
- Ministry of Energy and Mines
- Ministry of Labour & Citizens' Services - AIT
- Nanaimo Recycling Exchange
- North Shore Recycling Program
- Northern Environmental Action Team
- Nu Life Industries Inc.
- Raw Materials Company
- Recycling & Environmental Action Planning Society
- Recycling Council of BC
- Retail BC
- Retail Council of Canada
- Ridge Meadows Recycling Society
- SCRAPS
- Service Canada
- Society Promoting Environmental Conservation
- Southern Gulf Islands Recycling Coalition
- Sustainable Environment Network Society
- SWANA BC Chapter
- TeckCominco
- Toxco
- Union of BC Municipalities
- University of Victoria
- Vernon District A Community L

Appendix H: Packaging Design Example

TELUS has been recognized for its initiatives in packaging and printed matter. TELUS is one of five award recipients under the program *Greener Containers, Packaging and Printed Matter: Today's Reality, Today's Opportunities!* organized by **Éco Entreprises Québec** (ÉEQ).

For the program, TELUS submitted its brand-new plastic-free eco-packaging designed for phone cases, chargers, memory cards and other accessories. The new packaging will enable us to save close to 1,000 trees, eliminate 30 kilograms of solid waste, and trim consumption by 2,675 litres of water and nearly 4,000 cubic metres of natural gas yearly.

TELUS Marketing Communications presented our new plastic-free accessories packaging to some 100 representatives from various environmental industries and Quebec businesses.

Some highlights of the packaging:

- **Paper:** made from post-consumer fibre certified 100% recyclable by the Forest Stewardship Council (FSC), manufactured using recyclable energy and processed without chlorine by the company Rolland Enviro100 Print.
- **Label:** FSC certified, printed with vegetable ink, affixed with vegetable glue and manufactured by Taylor Label, which uses 100% green energy for its manufacturing.
- **Packaging:** reusable because it is not sealed shut.

Another important point: all materials used are Canadian. The paper comes from Quebec and the label and box are manufactured in Ontario. The manufacturing plant's proximity to the warehouse also helps reduce greenhouse gas emissions, not to mention the fact the new packaging takes up less space in the delivery trucks.

This new eco-friendly packaging is largely due to the considerable determination of TELUS' Production and Development team.



Overall TELUS strives to use recycled and recyclable materials, less packaging, and less plastic. TELUS is moving towards smaller designs and eliminating certain items (e.g. plastic inside trays). In addition, FSC certified recycled paper stock is utilized where possible.

Appendix I: Public Consultation Process - Summary

During TELUS' public consultation period, approximately 25 inquiries and comments were received via email and during the public conference call held on June 10th, 2010. Inquiries and comments included those regarding designing for the environment, batteries, promotional equipment, accessibility of our program, returns to other agencies, working with local government and targets. Below is a summary of the information provided in response to these inquiries.

Designing for the environment

Many products we deal with are developed for a global market based on consumer demands; however, TELUS is committed to working with our manufacturers where feasible and where an influence can be made. TELUS is committed to improving our supply chain management by working with prospective vendors and ensuring environmental and corporate social responsibility requirements are included in RFP's where applicable and feasible. Consideration with regards to packaging is also undertaken by the use of package minimization and use of recycled content.

Batteries

Questions regarding batteries included those regarding removal from equipment, processing and accountability. TELUS' electronic recycling vendor (GEEP) removes the batteries from equipment prior to processing. Our customers will be instructed to not remove the battery from the TELUS equipment they are returning to us for processing, enabling TELUS to properly manage both the electronic and the hazardous material within the battery. TELUS' electronics recycling vendor is both ISO 14001 and ISO 9004 registered. In addition, our vendor's downstream processor has also met these high standards. All our electronics recycling abides by the regulation that no hazardous material can be exported to non-OECD countries. With respect to accountability, TELUS receives regular reports from our electronics recycler that provides details on the various TELUS materials received and processed through their facilities including batteries. TELUS will report on our performance to the BC Ministry of Environment, as required under the Regulation as well as work with Rechargeable Battery Recycling Corporation of Canada (RBRCC) to ensure they obtain the figures they require for battery reporting.

Promotional Equipment

Upon review the separate category for promotional equipment has found to be redundant and has been removed from the stewardship plan as all items within this category are covered elsewhere within the plan.

Accessibility to TELUS' program

Accessibility to TELUS' program from all areas of the province is achieved via Canada Post, FedEx (business customers), intranet, TELUS call centre representatives and TELUS technicians.

Returns to Other Agencies

TELUS will continue to work with our stakeholders and other agencies to ensure there is good communication between all parties. TELUS is committed to working with the various agencies, including but not limited to Electronics Stewardship Agency of BC (ESABC) and RBRCC, to ensure that any issues which arise with regards to returns and/or double counting are dealt with in a fair and timely manner.

Working with Local Government

TELUS will work with local governments where required. TELUS is open to participating with them and finding solutions if issues arise with respect to waste streams and characterization.

Targets

TELUS has set realistic targets for recovering recyclable material. However, we believe there is always room for continued improvement.