ELECTRONIC PRODUCTS RECYCLING ASSOCIATION (EPRA)

END-OF-LIFE ELECTRONICS
COLLECTION SITE APPROVAL PROGRAM

- MAY 10, 2012 -

The *Electronic Products Recycling Association* (EPRA) *Collection Site Approval Program (CSAP)* defines the minimum operational, environmental, health, safety and data security requirements for organizations seeking to operate as an EPRA collection site; as well as the assessment and approval process.

The CSAP is intended to ensure that all approved program materials are handled in a responsible manner that adequately safeguards the environment and worker health and safety, and further provides for the security of data containing products and their data against any unauthorized access or use.

The CSAP does not replace any regulatory requirements, nor absolve any collection site from the responsibility of compliance under these requirements. Where the CSAP conflicts with a regulatory requirement, the regulatory requirement shall apply.

All collection sites are subject to assessment in accordance with the requirements of the CSAP prior to being authorized to operate on behalf of an EPRA program, and periodic re-verifications will be conducted to ensure continued conformance with the CSAP.

The CSAP may be revised or updated at EPRA's discretion to provide for the adequate handling of program materials and to prevent unauthorized access, theft, environmental releases or safety hazards.

The CSAP is comprised of the following parts:

PART A COLLECTION SITE STANDARD (CSS):
>	Defines the auditable criteria that collection sites must demonstrate conformance with in order to be considered for use under the Stewardship Program.

PART B IMPLEMENTATION GUIDE:
>	Provides additional guidance and resources to collection sites on the application of the CSS, as well as examples of suitable evidence of conformance to the CSS.

PART C ASSESSMENT AND APPROVAL PROCESS:
>	Defines the steps for collection sites to be assessed and verified to the CSS.

PART D AUDIT PROTOCOLS:
>	Defines the process for classifying and addressing audit findings.

PART E TERMS AND DEFINITIONS:
>	A glossary of key terminology.

PART F FORMS:
>	F.1 Collection Site Application Form
>	F.2 Collection Site Audit Report Form

PART A
COLLECTION SITE STANDARD

1.0 General Requirements

All Collection sites shall:

1.1. Be open to the public and permit free of charge collection of any approved program material generated within the province.

1.2. Possess valid permits, approvals and other business licenses as required to operate in the jurisdiction.

1.3. Possess Comprehensive or Commercial General Liability Insurance including coverage for bodily injury, property damage, complete operations and contractual liability with combined single limits of not less than $1 million per occurrence, $1 million general liability.

1.4. Possess evidence of valid workers compensation coverage.

1.5. Maintain an employee theft deterrent policy that defines at minimum the recourse for any incidents of theft or data security breaches, up to and including immediate dismissal.

2.0 Site Requirements

All Collection sites shall be appropriately maintained to ensure the safe access for users and secured storage of materials, including:

2.1. A material drop off area separate from truck loading docks and other material handling areas generally occupied by mobile equipment.

2.2. A covered and secured material sorting and storage areas with restricted access to employees only.

2.3. Appropriate security measures to prevent the unauthorized access to the premises and storage areas including during non-operational hours.

3.0 Environmental, Health and Safety Controls

All Collection sites shall maintain suitable environmental, health and safety (EHS) controls to prevent accidents, injuries or releases to the environment. At a minimum, the collection sites shall:

3.1. Maintain documented standards for the safe and secure storage, stacking, packaging and shipping of materials.

3.2. Maintain a documented process to conduct at minimum monthly inspections of the facility to identify any EHS risks or hazards, as well as potential data security issues, and a process to record and follow up on any issues identified.

3.3. Identify where the use of personal protection equipment (PPE) is required and enforce its proper use.

3.4. Maintain readily accessible and unobstructed access to fire escape routes and doors at all times.

3.5. Maintain adequate fire suppression equipment for the size/type of facility as required by regulation.

3.6. Maintain appropriate first aid program and supplies.

3.7. Maintain a documented procedure to provide notice to EPRA of any regulatory orders, fines, data security breaches, or other incidents that require the assistance of first responders (i.e. accidents or spills) within 24 hours of the occurrence.

4.0 Training

All collection sites shall provide at minimum annual, documented employee training, including the following topics:

4.1. The identification of materials accepted by the program.

4.2. The proper handling, storage and packaging of materials, including the handling of broken materials.

4.3. Requirements for tracking material receipt and shipments.

4.4. Safety and emergency response procedures, including first aid; accident response; fire safety; emergency evacuation; and spill response.

4.5. Mobile equipment operator training.

5.0 EOLE Handling

All collection sites shall maintain adequate processes to ensure the safe and secure handling of materials, including the following:

5.1. Maintain a documented process to ensure that all incoming materials are immediately moved to a covered and secured storage area upon receipt.

5.2. Maintain a documented process for tracking incoming material to suitably account for all program material separate from other non-program materials and prevent program material from being handled or otherwise disposed outside of the program.

5.3. Maintain procedures to identify the maximum quantity of material that is capable of being stored on site in a safe manner, in accordance with health and safety requirements and fire regulations, and ensure that limits are not exceeded.

5.4. Maintain suitable inspection and maintenance programs for any material handling equipment including, lift trucks, pallet carts and weigh scales.

PART B
IMPLEMENTATION GUIDE

The following information provides further guidance and detail on the requirements of the Collection Site Standard, as well as examples of suitable evidence of conformance to the Standard. Where the collection site does not maintain controls as defined in the Implementation Guide, an equivalent alternative must be demonstrated.

6.0 General Resources

6.1.   The collection site must be open to the general public and may not impose any restrictions, such as consumer handling fees, on the collection of approved program material.

6.2.   Permits and other approvals to be considered by collection sites include:

6.2.1.   Business / operating permits

6.2.2.   Waste handling permits / registrations

6.3.   Comprehensive or general liability insurance coverage in the amount of $1 000 000 is considered the minimum acceptable coverage to suitably mitigate the potential risks associated with the collection of EOLE, however, consideration should also be given to maintaining environmental pollution liability coverage.

6.4.   Adequate worker's compensation coverage is dependent on the size of the work force and the type of operations undertaken. Coverage must be sufficient to insure all workers in the event of need. Coverage may be obtained through provincial program or through a private insurance policy, and evidence of coverage may be in the form of an insurance certificate from the Recycler's insurance company or broker, or confirmation of participation in the provincial workers' compensation plan, or equivalent.

6.5.   The employee theft deterrent policy should clearly define the expectations for the secure handling of EOLE to prevent theft or access to data, and the consequences of any deviation from the policy.

7.0 Site Resources

Adequate facilities and effective operational controls must be maintained to provide for the safe and secure receiving, storage and handling of EOLE.

7.1.   Material drop off areas accessible by the general public must be clear of hazards and moving equipment, and properly equipped to facilitate the receiving of EOLE.

7.2.   The facility should be adequately sized and equipped to provide enclosed material storage areas to prevent exposure to the weather and unauthorized access to the material.

7.3.   Appropriate security measures must be in place to protect any materials or data from removal or other unauthorized access.

8.0 Environmental, Health and Safety Resources

8.1. Work instructions or other operating procedures should be developed and communicated to workers to define the requirements for storage, stacking and packaging of materials.

8.2. Facility inspections should cover all aspects of the facility and operations and should be used to identify any potential environmental, health, safety or security risks or hazards. Inspections should be documented and all results of the inspections tracked to identify any trends in risks and confirm that identified issues have been adequately addressed.

8.3. Where personal protective equipment (PPE) is required, workers should be trained on the need for the PPE; all areas/operations requiring the use of PPE should be suitably identified; and the usage of the PPE must be enforced.

8.4. Emergency exits should be clearly identified and exit routes should be maintained clear of obstructions at all times.

8.5. Facilities may be equipped with fire extinguishing sprinkler systems but at a minimum must contain a sufficient number of readily accessible and charged fire extinguishers suitable to the potential size and type of fires.

8.6. An adequate first aid program should be maintained and include detailed emergency response procedures, worker training, and a suitable stock of the necessary first aid supplies.

8.7. Procedures should be established and documented, detailing the responsibility and appropriate contact information for responding to and reporting any emergency situations or other reportable incidents.

9.0 Training resources

9.1. The training program should define the qualifications and training requirements by job function as well as the frequency for any subsequent refresher training courses, and should consider the need for a participant assessment or other evaluation tool to determine the effectiveness of the training and knowledge retention.

9.2. Records of all completed training and assessments should be appropriately maintained.

10.0   EOLE Handling Resources

10.1. Adequate facilities and effective operational process controls should be maintained to provide for the safe and secure receiving, storage and handling of incoming materials.

10.2. Materials must be suitably identified, tracked and moved to defined storage areas upon receipt.

10.3. Controls should be maintained to ensure that materials are not over-accumulated or stored in a manner that creates a hazard or leaves them susceptible to theft.

PART C
ASSESSMENT AND APPROVAL PROCESS

11.0   Eligibility

In order to be considered as a collection site, the organization shall:

11.1. Operate under the Stewardship Program solely as a collector;

11.2. Not reuse, refurbish or otherwise manage program material outside of the Stewardship Program; and

11.3. Continue to operate in accordance with the minimum requirements of the CSS and all applicable regulatory requirements, and maintain documented evidence of such.

12.0   Assessment Process

The CSAP Assessment Process consists of the following steps:

12.1. Application review;

12.2. On-site operational audit; and

12.3. Submission of the Final Audit Report.

13.0   Application Review

13.1. The perspective organization is responsible for completing the *Collection Site Application Form* and submitting it to the Stewardship Program along with any necessary supporting documentation.

13.2. The Stewardship Program will determine if the application is complete and sufficient background evidence has been provided in order to initiate the On-site Operational Audit.

13.3. Applications considered complete will be assigned to an approved Auditor to begin the audit process; applicants that have not met the requirements will be notified that their application is incomplete and that further information is required prior to proceeding with an audit.

14.0   On-Site Operational Audit

14.1. The Auditor will conduct a site review and assess operational and procedural information against the criteria of the CSS, taking in to account where applicable the direction provided by the Implementation Guide.

14.2. Based upon visual observations and the objective evidence provided by the organization, the Auditor will prepare an assessment report detailing a summary of findings, and provide a list of any nonconformances identified.

14.3. All identified deficiencies must be addressed prior to recommending the collection site for approval.

15.0   Submission of the Final Audit Report

15.1. Following the audit process, and the submission and assessment of any corrective action plans, the auditor will compile a summary of audit information and prepare a final report to the Stewardship Program. The final report will include:

15.1.1. General observations from the audit;

15.1.2. The results of the On-site Operational Audit including any identified deficiencies and the actions taken to address them; and

15.1.3. A statement of conformance to the requirements of the CSS at the time of the assessment.

16.0   Stewardship Program Review and Approval

16.1. The Stewardship Program will review the Auditor's final report and recommendation, and may request the auditor follow-up on additional issues once the final report has been issued in order to make a final decision on the approval of the organization.

16.2. Once satisfied that all program requirements have been addressed, it is at the Stewardship Program's discretion to offer a contract to the organization for the provision of collection services.

17.0   Surveillance and Reporting

17.1. At its discretion, the Stewardship program may conduct interim reviews or assessments in order to confirm that the organization continues to operate in accordance with the requirements of CSS. Reviews or assessments may include but are not limited to, site reviews, document reviews, and/or record reviews.

17.2. Failing to meet any of the requirements of the Stewardship Program or the CSS will result in the revocation of the organization's approval.

18.0   Communication of Audit Results

18.1. All application and audit information will be shared with the Stewardship Program.

18.2. The Auditor will report all audit results and observations to the Stewardship Program in writing on the approved Collection Site Audit Report Form, and will provide a final copy of the report to the auditee.

PART D
AUDIT PROTOCOLS

19.0   Audit Objective

19.1. The objectives of the CSAP audit are to:

19.1.1. Assess the conformance of the organization and its operations to the requirements of the Collection Site Standard (CSS); and

19.1.2. Determine if the organization operates in accordance with its established programs and procedures.

19.2. The audit will involve a review and assessment of objective evidence which may include, but is not limited to policies, procedures, work instructions, shipping records, training records, permits, certificates, memos, employee interviews and general observations.

20.0   Classification of Audit Findings

Issues identified during the audit will be classified by the Auditor as one of the following:

20.1. Observation – where the item does not pose a threat the environment, worker safety, or data security and is not a contravention of any element of the CSAP, but does represent an opportunity for improvement; or

20.2. Nonconformance – where the operations do not conform to an element of the CSAP; do not comply with a regulatory requirement; or do no conform to the organization's established programs or procedures.

21.0   Corrective Action Plans

21.1. Audit observations do not require formal follow up with the Auditor however they will be subject to review during any subsequent assessment or re-verification.

21.2. An action plan to address any nonconformances must be submitted to the Auditor within 15 days of the Auditor issuing the final audit report.

21.2.1. All nonconformances must be satisfactorily addressed to prevent reoccurrence prior to any further consideration by the Stewardship Program.

21.2.2. Inability of the organization to provide a satisfactory resolution to a nonconformance within 60 days of being issued will result in the closure of the audit, with the final audit status indicated as unapproved and any further consideration of the applicant must be addressed under a new application.

PART E
TERMS AND DEFINITIONS

Approved Program Material: End-of-life electronics generated within the Province and covered under the Provincial Stewardship Program.

Collection: Receiving, sorting, packaging and storing of obligated program materials for shipment to program approved consolidation points and/or recyclers. Collection does not include any processing or reuse/refurbishing functions.

Collection Site: A facility approved and contracted under the Provincial Stewardship Program to collect approved program materials.

Collection Site Approval Program: A six part publication that defines the minimum requirements and approval process for the Provincial Stewardship Program collection sites.

Collection Site Standard (CSS): Defines the minimum operational, environmental, health, safety and data security requirements for organizations seeking operate as a collection site under the Provincial Stewardship Program.

End-of-Life Electronics (EOLE): Unwanted or discarded electronic equipment.

First Responder: Police, Fire or Ambulance

Implementation Guide: Provides additional guidance and resources to Collection Sites on the application of the CSS.

Processing: Dismantling and sorting of electronic products and/or materials into various material streams for the reclaim of recyclable materials and other approved management of residuals.

Primary Recycler: An entity that receives intact end-of-life electronics and initiates the recycling process through dismantling and other material separation processes.

Spill: An uncontrolled release to the natural environment.

Refurbishing: Any disassembly of electronics for the purpose of internal testing or troubleshooting; or, replacement or repair of non-functioning parts, not including consumable items such as batteries, toners, fusers, etc.

Reuse: The provision of functioning electronics to another user for its intended purpose, without hardware repair or modification. The reuse activities are limited to non-intrusive operation verification; cleaning; replacement of consumable items such as batteries, toners, etc.; data and other information clearing; and software installation.

Worker: Any full time, part time or contract worker

PART F
FORMS

F.1 COLLECTION SITE APPLICATION FORM

Company Name:	
Address:	

City/Town:		Site Contact:	
Province:		Phone:	
Postal Code:		email:	

Description of Current Operations and Site Uses:	

Site Size:		Building Size:	
Years in Operation:		# of Employees:	

Site ownership:	☐ Leased	☐ Owned
Has the organization received any fines or regulatory orders within the past 5 years; or Had any other incident that has required the notification or dispatch of first responders?	☐ Yes	☐ No
If yes, describe:		

Insurance & Approvals	Reference Number	Details (term, expiry, coverage, etc.)
Insurance:		
Worker Compensation:		
Operating Permits:		

Policies and Procedures – Provide a copy of each of the following:
☐ Employee theft deterrent policy
☐ Standards for the safe and secure storage, stacking, packaging and shipping of materials
☐ Facility inspection procedure(s) – environment, health, safety and security
☐ Procedure to provide notice to EPRA of any orders, fines, data security breaches, etc.
☐ Process for tracking and accounting for all program material
☐ Calculation for the maximum quantity of material that is capable of being stored on site

Confirmation of Data and Sign-Off	
☐	Check to confirm that all data provided in the application and associated documentation is current and valid for your organization at the time of submission of the application.
☐	Check to confirm that your facility operates, and will continue to operate, in compliance with all applicable regulatory requirements and the requirements of the CSS.
Application Submitted By:	Date:

F.2 COLLECTION SITE AUDIT REPORT FORM

Company Name:	
Address:	
City/Town:	Site Contact:
Province:	Phone:
Postal Code:	email:

The objectives of this audit were to:
- *Assess the conformance of the organization and its operations to the requirements of the Collection Site Standard (CSS); and*
- *Determine if the organization operates in accordance with its established programs and procedures.*

Audit Date: _____   Auditor: _____

Standard Audited To: ☐ - *Collection Site Standard*
(*End-of-Life Electronics Collection Site Approval Program* – May 10, 2012)

SCOPE OF THE AUDIT

AUDIT OBSERVATIONS

NONCONFORMANCES

Details of the nonconformance:	**1**	of	**##**

[CSS Element # – Description]

Follow up actions:
[Date – Details]

☐ - Nonconformance satisfactorily closed on [**Date**]

Details of the nonconformance:	**2**	of	**##**

[CSS Element # – Description]

Follow up actions:
[Date – Details]

☐ - Nonconformance satisfactorily closed on [**Date**]

AUDIT CONCLUSION

Based on the information assessed, the organization has provided satisfactory objective evidence to demonstrate that it:

• Operates in conformance and possesses the ability to continue operating in conformance with the CSS	☐ Yes	☐ No
• Operates in accordance with its established programs and procedures	☐ Yes	☐ No

As a result,

☐ Verification to the CSS is withheld until satisfactory evidence of closure is provided to the auditor for the identified nonconformances.

☐ The facility is recommended for approval to the CSS with no outstanding nonconformances.