



## **End-of-Life Electronics Stewardship Program for New Brunswick**

Submitted: January 7, 2017

Submitted to: **Recycle New Brunswick (RNB)**

Submitted by: **Electronic Products Recycling Association (EPRA)**

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## 1. Introduction

Electronic Products Recycling Association (EPRA) is pleased to submit this Stewardship Program for regulated end-of-life electronics (EOLE) in New Brunswick.

EPRA is incorporated to deliver regulated programs in all provinces. Canada's electronics industry created EPRA as the national not-for-profit entity chartered with improving the efficiency and effectiveness of Canada's industry-led and regulated electronics stewardship programs.

Members of Electronics Product Stewardship Canada (EPSC) and the Retail Council of Canada (RCC) established EPRA in 2011.

## 2. Program Summary

This document provides our Electronic Stewardship Program Plan to divert regulated unwanted and end-of-life electronics (EOLE) from disposal, as required by the October 20, 2015 amendments to the Designated Materials Regulations under the Clean Environment Act.

As per Section 50.35(2) of the Regulations, EPRA first submitted a stewardship plan within the 180 days after the commencement of the regulations.

Moving forward, EPRA will need to work closely with Recycle NB (RNB) to ensure the program commencement date takes into account a number of important considerations our industry requires be met, including the very busy back-to-school and Holiday retail cycles (between September and February). It's key we work cooperatively here to ensure the regulations have a minimal effect on businesses in the province and will not hamper their ability to operate effectively with customers at the critical and busiest times of the year.

Barring any major changes, EPRA would formally launch the program on **March 30, 2017**.

For more than eight years, EPRA has actively collected more than 38,000 metric tonnes of waste electronics at more than 120 Drop-Off Centres across Atlantic Canada. It has operated a successful, regulated, electronics recycling program in Nova Scotia since February 2008, in PEI since July 2010 and in Newfoundland and Labrador since August 2013.

**“brand owner” means:**

**(b.1) in Part 5.2, with respect to an electronic product sold, offered for sale or otherwise distributed in or into the Province, a person who**

**(i) is a manufacturer of electronic products,**

**(ii) is a distributor of electronic products,**

**(iii) is an owner or licensee of a registered or unregistered trademark under which electronic products are sold, offered for sale or distributed, or**

**(iv) if an electronic product is imported into the Province, is the first person to sell the electronic product; and**

Under our plan, regulated electronic products are not only diverted from landfill, but also from illegal export through the collection and recycling of unwanted products at their end-of-life. Recovered materials are put back into the manufacturing supply chain so that fewer natural resources are required. These benefits will be emphasized in the communications and public awareness strategy which will maximize participation in this stewardship program.

As per the Regulation, EPRA Product coverage may include the following categories\*:

- Televisions
- Desktop, laptop and notebook computers and selected peripherals such as keyboards and mice
- Computer monitors
- Computer desktop printers and desktop multi-function devices
- Desktop scanners
- Audio and video playback and recording systems
- Telephones
- Fax machines
- Personal digital assistants and other similar handheld devices
- Digital cameras
- Analog or digital video cameras
- Cellular phones and other wireless communication devices

*\*Exclusions include specialized products that are designed exclusively for operation in an industrial, commercial or institutional (ICI) setting, and factory-installed audio, video or communication devices developed for embedded use in motor vehicles.*

EPRA will develop a comprehensive listing of covered products that will closely align with those covered elsewhere in our Atlantic Canada programs.

### **3. Program Principles**

EPRA offers a product management program that will:

- Be consistent with industry's guiding principles for stewardship programs which include promotion of the Electronics Recycling Standard (ERS) and harmonization with other jurisdictions where and to the extent possible;
- Be open to all obligated stewards;
- Provide for a level playing field that ensures fair competition;
- Achieve a high level of compliance and eliminate the potential for free-riders;
- Adequately address the issue of orphan, historic, and imported products from companies without a New Brunswick or Canadian presence;
- Ensure unwanted and end-of-life program materials are recycled in a responsible manner, meeting all occupational health, safety and audit provisions of the Electronics Recycling Standard (ERS).
- Ensure the program is delivered in an environmentally sound and economically efficient manner; and
- Include public transparency for financial and environmental reporting.

### **4. Management Structure of the Program**

All activities associated with the program will be managed by EPRA Atlantic Canada Director.

#### **4.1 EPRA Atlantic Advisory Committee**

EPRA has established an advisory committee to foster the exchange of information on our program and as a forum to discuss issues of local concern. EPRA will seek to expand the committee with a New Brunswick representative as the program launches.

#### **4.2 New Brunswick Program Management**

EPRA will appoint a bilingual Program Director located in the province at launch date who will be responsible for the following aspects of the program:

- Establishing and maintaining a drop-off centre network for the program in New Brunswick;
- Establishing and maintaining the infrastructure for transportation of materials collected from the drop-off centre network;
- Overall day-to-day management of the collection and transportation network in New Brunswick.
- The bilingual Program Director recruitment process will begin as soon as the program plan is approved. EPRA can provide Recycle NB with updates on the recruitment progress.

### **5. Program Details**

This section of the proposal details the collection, transport and consolidation services and monitoring activities to be carried out by EPRA and its contracted service providers.

**Regulatory Requirement**

**(a) a plan for the collection, transportation, storage, reuse and recycling of electronic waste in the Province, including the electronic waste of other brand owners;**

## 5.1 Collection, Transportation and Consolidation

**Regulatory Requirement**

**(d) information on the population and geographic area to be served;**

**(e) a plan for the provision of services to remote or rural areas, if applicable;**

The EPRA New Brunswick program will:

- Collect designated program materials in all areas of the province;
- EPRA will establish 31 drop-off locations in the key population centres by launch date and will implement the remaining 24 locations by October 1, 2017. Should acceptable locations be unavailable on the designated list EPRA will consult with RNB on alternate locations.
- Use a network of drop-off sites to provide adequate, appropriate and convenient free of charge drop-off service to the residential and business sectors.
- Transport the collected materials in a safe and efficient manner.

To ensure that the proposed network of drop-off sites is adequate, appropriate and convenient, EPRA has established the **Collection Site Approval Program (CSAP)**, a six-part publication that 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. For information on CSAP see: <http://raq.ca/wp-content/uploads/2014/01/CSAP-EN.pdf>

The CSAP requirements will include the following criteria for service:

- Drop-off sites shall be strategically located to ensure that the majority\*\* of New Brunswick residents are served.
- All drop-off sites shall be open a minimum of 30 hours per week, including four (4) hours on Saturday (except statutory or civic holidays) or as approved by EPRA.
- All drop-off sites shall have a sufficient floor space to accommodate the safe and efficient handling and storage of program materials accepted from the general public and other sectors;
- All drop-off sites shall accommodate scheduled drop-offs of large quantities of program materials from New Brunswick residents.

## 5.2 Monitoring of the EPRA Collection Network

The following is a description of the measures that will be implemented with respect to monitoring the EPRA collection network in New Brunswick.

The EPRA toll-free helpline is used as a primary tool to monitor public & steward feedback on both geographic/population coverage and customer service levels provided by our drop-off centre network. All calls relating to these key elements are reviewed regularly by call center staff and transferred to the Program Director to be addressed or researched.

\*\* With respect to geographic/population coverage, EPRA will conduct regular reviews to ensure the network meets the needs of New Brunswick residents. A regular mapping exercise will be commissioned by EPRA which will keep actual versus targeted accessibility measurements current and to identify any service gaps. EPRA will use current Census data from Statistics Canada to understand the population distribution of New Brunswick residents, and will apply a convenience factor analysis. As a broad guideline, EPRA will look to source collection depots or collection events within a 30 minute drive of residents, but recognizes that there may be challenges in certain rural and remote regions.

### 5.3 Options for Unwanted Electronics

**Regulatory Requirement**

**(f) a plan for the management of electronic waste in adherence to the following order of preference:**

- (i) reuse;**
- (ii) recycle;**
- (iii) recovery of energy; and**
- (iv) disposal in compliance with the Act;**

**Listed in order of Preference:**

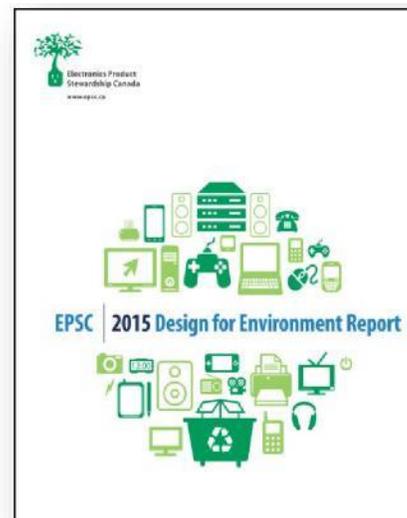
**Regulatory Requirement**

**(g) a description of the efforts being made by the brand owner to redesign electronic products to improve reusability and recyclability;**

**Regulatory Requirement**

**(k) a plan for the elimination or reduction of the environmental impacts of electronic waste.**

**Reduce:** Electronics Product Stewardship Canada (EPSC) represents major electronics and IT equipment brand owners in Canada on sustainability issues. EPSC issues its *Design for Environment* (DfE) Report (the 2015 edition is now available here: <http://epsc.ca/2015-design-for-environment-report/>), which highlights the industry's progress related to design for the environment, along with the many technological advances that are creating change in electronics design. The electronics sector has made a shift to more mobile, multi- functional and light weight products. This past year more and more electronics products do not use cables or plugs and have become mobile. This trend has made a positive impact on the increased ability for today's electronics to be reused and refurbished. This year's report builds on previous reports, with a focus on building sustainability into new product design. EPRA will report annually on DfE issues as provided through this research.



**Reuse:** Reusing unwanted electronic products will be promoted through the communications and public awareness program as the first option where markets and opportunities for reuse in-province exist. For New Brunswick residents considering this option, caution should be exercised and particularly with respect to protection of personal information. EPRA has established the Electronics Reuse & Refurbishing Program (ERRP - <http://rqp.ca/wp-content/uploads/2014/01/ERRP-EN.pdf>) to assist with their qualification. Obligated products that are used or refurbished will not attract an EHF

**Regulatory Requirement**

(i) the location of any long-term storage, containment or final treatment and processing facilities for electronic waste;

**Recycle:** Recycling or processing of unwanted and end-of-life electronics will be promoted as the final option. Recycling, which diverts electronics waste from landfill and illegal export, is a major focus of this program. Typically, recycling involves some form of "primary" or initial processing, which may include dismantling and sorting of material by hand or by more elaborate mechanical means. Further manual or mechanical separation of materials by another vendor or vendors is considered "downstream" processing. Material flows will be tracked to their "point of final processing", i.e. where they are altered into a new product or state or, for unrecyclable hazardous materials, to their point of disposal, i.e., where they are disposed of in an environmentally sound manner.

**Disposal:** EPRA's utilization of the Electronic Recycling Standard (ERS) ensures the majority of materials resulting from the processing of regulated end-of-life electronics are responsibly recycled and put back into the supply chain. However, there will be selected materials for which there is no viable option for recycling. An example would be wood waste from older television consoles. For these materials, EPRA will require that processors follow established local guidelines.

## 5.4 Standards and Procedures for Recyclers of E-Waste

(j) a description of how electronic waste will be managed in a manner that employs environmental, human health and safety standards that meet or exceed applicable laws; and

To ensure that all materials collected under the program are responsibly recycled, EPRA contractually requires all recyclers to meet the requirements of the Electronic Recycling Standard (ERS) and to have successfully completed the audit and approval process which may be updated from time to time in order to ensure they meet the ongoing needs of the programs. Additional information on the Recycler Qualification Process can be obtained at [www.rqp.ca](http://www.rqp.ca).

## 5.5 Expected Program Outcomes:

Calculating the success of EPRA-collected end-of-life electronics (EOLE) in the initial years of the program in New Brunswick is a complex issue. Our experience in Atlantic Canada to date, and elsewhere in Canada has shown that a number of factors will have a major impact here, including:

- The willingness of New Brunswick residents and entities to “take action” and bring their EOLE to EPRA;
- The relative age and weight profile of historic and orphan electronic waste currently stored by New Brunswick residents and entities, as industry trends clearly indicate that newer products are becoming significantly lighter;
- The ability for EPRA to find suitable business arrangements with various contractors for the collection of EOLE across the province; and,
- Eventually, the advent of a province-wide landfill ban on EOLE.

EPRA's experience has shown that Awareness and Access are the two key factors for program success.

## 6. Program Funding

### 6.1 The Environmental Handling Fee

The program will be funded by an Environmental Handling Fee (EHF) that is levied on sales of new products listed under the Designated Materials Regulation. The EHF will allow all New Brunswickers to drop-off EOL electronic products at designated drop-off sites at no charge with the assurance that these items will be responsibly recycled.

The EHF for each product designated by regulation will reflect the true cost of managing that product. The EHF will fund:

- Collection, handling, consolidation, transportation and recycling;



- Communications;
- Public Awareness;
- Compliance and Administration Expenses;
- Environmental audit expenses;

## **6.2 Setting the Environmental Handling Fee**

To closely align the fees to the product and users of the product, rather than a single flat fee set across all designated electronics products, the environmental handling fee is set by product category.

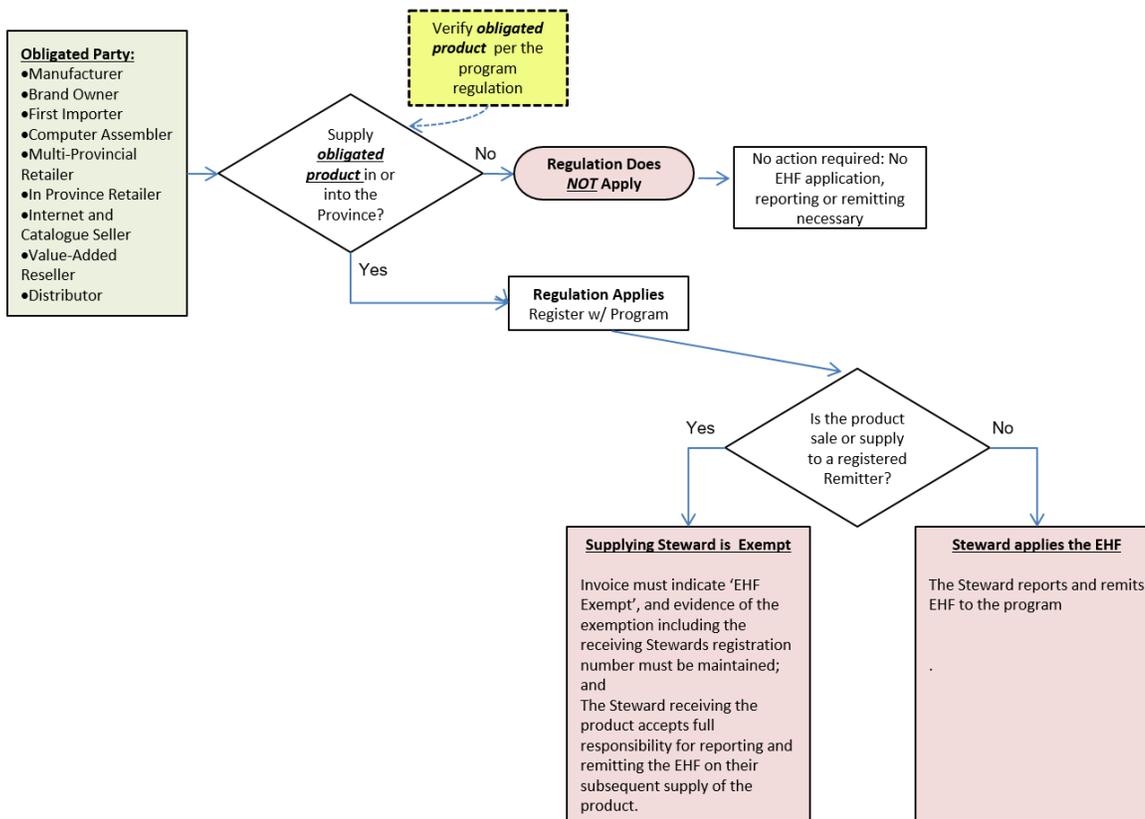
EPRA undertakes regular financial reporting to monitor revenue generated by the program and to ensure that funds are sufficient to fund all of the program activities identified in Section 6.1. To ensure long-term sustainability, the program will develop a Contingency Reserve in the event that collection and recycling costs exceed the funds available. This can happen in times of economic downturn or other unforeseen events, nevertheless requiring an uninterrupted, responsible electronics recycling service to continue. Once the program has moved beyond the start-up phase, or 2 full years of operation, the contingency reserve is planned to be in the one year operating range of program costs. This reserve guideline may be modified due to current or anticipated changes in business conditions. The New Brunswick program shall be audited annually by an independent external auditor.

## **6.3 Environmental Handling Fee Flow**

Obligated brand owners, also referred to as stewards, registered under the EPRA plan shall remit Environmental Handling Fees monthly to EPRA for their previous month's net sales (total sales less returns).

Because the product supply chain is complex and electronics are sold through a variety of channels, each registered steward will be classified as either a "Remitter" or "Pay-on-Purchase" (POP) steward. While a Remitter would usually be a larger entity (e.g. manufacturer, national retailer or distributor), they can also be a small, New Brunswick-based reseller or retailer. The POP classification was introduced to minimize the administrative burden of monthly reporting on these smaller, local resellers and retailers. However, these smaller, local businesses may choose to be either a Remitter or POP.

# APPLICATION OF THE EHF



## 7. Communication and Public Awareness

**Regulatory Requirement**  
 (h) a communications plan for informing consumers of the brand owner’s electronic products stewardship plan, including the consumer’s reasonable and free access to return facilities;

### 7.1 Communication Goals

The focus of the communications plan is two-fold: to create awareness in New Brunswick regarding the EPRA electronics recycling Program and to ensure that brand owners and retailers of regulated products have the opportunity to fulfill their obligations under the Designated Materials Regulation via membership in EPRA. The communications plan provides very clear messaging to all Program stakeholders. The goals of EPRA’s communication activities are to:

- Ensure New Brunswickers are aware of the EPRA Program, in particular the products that will be accepted in the Program and where to take them for responsible recycling;
- Make sure that the electronic products brand owners and retailers of regulated products are aware of their obligations related to the EPRA Program in New Brunswick;

- Ensure EPRA Drop-off Centres continue to be well informed regarding electronic products included in the Program and can provide accurate information to customers.

## 7.2 Communication Components

All existing communication materials are appropriately informative to facilitate education and awareness for consumers and businesses of the EPRA New Brunswick Program. EPRA will continue to provide signage to the network of Drop-off Centres. Promotional material (for example bilingual brochures and tent cards) will be made available for electronic product retailers to order and to display. Examples of these can be found at:

<http://recyclemyelectronics.ca/pei/resources/communications-pos-materials/>

One message of primary importance will be that all consumers can drop off electronics free of charge at authorized EPRA New Brunswick Drop-off Centres with the assurance that they will be responsibly recycled.

Media campaigns will be utilized to convey information about the EPRA New Brunswick Program. Examples of the primary components of the campaign would be radio, print and online advertisements. EPRA has launched a new national consumer facing brand campaign with province-by-province specific print, radio and online advertisements. Research was conducted to confirm the campaign message that would resonate most with residents to motivate them to e-recycle. The vast majority of respondents felt that responsible recycling of electronics was important in helping to pay it forward environmentally. The EPRA brand campaign that was developed currently is "Extend nature's warranty. Recycle your electronics." It uses images of nature with television static as a visual metaphor threatening to remove a part of nature. The pay it forward message is to help empower and motivate consumers to do the right thing for the environment by e-recycling their EOLE through EPRA New Brunswick Drop-off Centres. On the advertisements there is a link to (or mention of) the website URL so that residents can find out more information on the location of the Drop-off Centres, obligated products and the associated EHF's. These ads are developed in English and French.

EPRA will follow the regulations in regards to consumer Information. Educational and consumer materials about the program plan, access to return facilities and the environmental and economic benefits of participating in the program will be sent to Recycle NB for approval before release. EPRA will also follow Recycle NB's "Corporate Identity and Brand Standards Manual".

Examples of our bilingual ads can be viewed at:

<http://recyclemyelectronics.ca/pei/resources/communications-pos-materials/>

Public opinion polling is also conducted on an annual basis to determine awareness of electronics recycling in the province and this information will be outlined in EPRA's Annual Report.

EPRA provincial program websites were completely revised in 2014 and will continue to be updated on an ongoing basis to reflect any future expansion of the program, or changes to any of the EHF's. It will continue to clearly outline all of the materials acceptable for recycling, as well as offer a Drop-off Centre locator with all of the locations in the province.

EPRA has also developed two (2) videos on e-recycling that are available for viewing in English and French and downloading on the EPRA website.

The first video is titled, “**What happens to end-of-life electronics?**” and it illustrates and explains to viewers how end-of-life electronics (EOLE) that are dropped off at an EPRA Drop-off Centre are recycled responsibly. This video is available to view in English at:

<http://www.recycleMYelectronics.ca/pei/what-can-i-do/where-does-it-go/>.

It is available to view in French at:

<http://arpe.ca/qui-nous-sommes/quarrive-t-il-ensuite>

The second video is titled, “**What is the EHF?**” and it explains what the EHF is and why it is charged. This video was developed to help consumers learn about the EHF and also to assist Retail to train their staff on how to answer questions from consumers on the EHF. It can be viewed in English at:

<http://www.recyclemyelectronics.ca/pei/stewards/what-is-the-ehf-a-training-video/>.

It is available to view in French at:

<http://arpe.ca/quel-est-le-role-des-membres/que-sont-les-ecofrais>

The EPRA toll-free helpline service will continue to accommodate inquiries from New Brunswick residents and other stakeholders and will continue to be an important communication tool. All calls are answered by EPRA call centre staff trained to answer New Brunswick-specific calls. Both English and French staff are available.



#### **Regulatory Requirement**

##### **(c) information with respect to:**

- (i) return facilities to be used by consumers,**
- (ii) adherence to established vendor qualification standards;**

## **8. Audit Systems**

EPRA has adopted and/or implemented audit standards and protocols to assist in ensuring that both its registered members and contracted recyclers achieve and maintain compliance with the EPRA Program and governing regulation.

## 8.1 Auditing of Obligated Brand Owners

### Criteria for Audits:

Detailed audits of remitters (brand owners) will be performed on a regular basis to ensure both compliance and completeness in the reporting of revenue. Audit selection is a function of, but not limited to, materiality, any non-standard or unusual behavior, and random selection.

### Audit Procedures:

Audits will follow established procedures and may involve a review of, but not limited to, the following records: sales records, purchase records, inventory counts and bank statements. All brand owners selected for audit will receive a letter detailing the time and place of audit and a request for records to review.

## 8.2 Auditing of Recyclers

EPRA requires that all primary recyclers and each of their respective downstream processors providing services to the program be first qualified through the Electronics Recycling Standard in order to receive and process program materials.

### Regulatory Requirement

**(b) information on the expected number of units or weight of electronic waste to be collected, reused, refurbished, recycled or recovered, as well as the expected associated costs;**

## 8.3 Performance Measurements and Continuous Improvement

EPRA has committed to annually report on a core set of measurements which may include operational, accessibility and awareness metrics.

With respect to program "Awareness" above, an evaluation of the communication and public awareness tools used may also be conducted to determine the strategy's effectiveness in getting the message out to the public. The program will be continuously monitored for opportunities to make improvements, both from an operational and strategic perspective.

Other issues to be reviewed on an ongoing basis include:

- The evolution of obligated products to ensure the industry is current with changes in the marketplace and the end-of-life stream.
- Electronics waste management developments.

# APPENDIX A

## **EPRA Key Contacts:**

Gerard MacLellan, Executive Director, Atlantic Canada

Scott Langille, EPRA Atlantic Operations and Logistics Manager

Cliff Hacking, President and CEO

Lynda Kitamura, Chief Financial Officer and Vice President, Finance and Operations

Christy Teasdale, National Director, Marketing and Communications

Jay Illingworth, National Director, Harmonization

## APPENDIX B

### EPRA Drop-off Locations – Program Launch

1. Bathurst
2. Blackville
3. Bouctouche
4. Campbellton
5. Caraquet
6. Dalhousie
7. Dieppe
8. Edmundston
9. Florenceville
10. Fredericton (2)
11. Grand Bay
12. Grand Falls / Grand-Sault
13. Hampton
14. Hartland
15. Memramcook
16. Miramichi (2)
17. Moncton
18. Oromocto
19. Quispamsis
20. Riverview
21. Sackville
22. Saint John (2)
23. Salisbury
24. Shediac
25. Shippagan
26. St. George / Black Harbour
27. St. Stephen
28. Sussex
29. Tracadie
30. Woodstock
31. St. Quentin/Kedgwick