



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

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

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

For the 5 Year Period: **January 13, 2019 to January 13, 2021** to replace
the approved January 2017 to January 2019 Program Plan

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EPRA End-of-Life Electronics Stewardship Program for New Brunswick

1. Introduction

Electronic Products Recycling Association (EPRA) is pleased to submit this revised Stewardship Program for regulated end-of-life electronics (EOLE) in New Brunswick. EPRA New Brunswick launched in March of 2017 and in just our first year of operations, we opened more than 60 drop-off locations throughout the province, making it convenient for all New Brunswickers to recycle their end-of-life electronics. Looking forward, EPRA New Brunswick will continue to build public engagement and drive end-of-life electronics recycling throughout the province.

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 Designated Materials Regulations under the Clean Environment Act.

As per Section 50.39(1) of the Regulations, EPRA is submitting this stewardship plan renewal.

The Regulations require the following information in program Plans:

50.36 An electronic products stewardship plan shall contain the following:

- (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;
- (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;
- (c) information with respect to : (i) return facilities to be used by consumers, (ii) adherence to established vendor qualification standards;
- (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;
- (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;
- (g) a description of the efforts being made by the brand owner to redesign electronic products to improve reusability and recyclability;
- (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;
- (i) the location of any long-term storage, containment or final treatment and processing facilities for electronic 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
- (k) a plan for the elimination or reduction of the environmental impacts of electronic waste.

2.1 Program Principles

EPRA New Brunswick's stewardship program is:

- 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;
- Open to all obligated stewards;
- Providing a level playing field that ensures fair competition;
- Achieving a high level of compliance and eliminate the potential for free-riders;
- Addressing the issue of orphan, historic, and imported products from companies without a New Brunswick or Canadian presence;
- Ensuring 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).
- Ensuring the program is delivered in an environmentally sound and economically efficient manner, And;
- Includes public transparency for financial and environmental reporting.

2.2 Management Structure of the Program

All core activities associated with the program are managed by EPRA New Brunswick Director.

- **New Brunswick Program Management**

EPRA has appointed a bilingual Program Director located in the province who is 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;
- Over all day-to-day management of the collection and transportation network in New Brunswick.

- **RNB ELECTRONIC INDUSTRY ADVISORY COMMITTEE:**

EPRA is interested in working co-operatively with Recycle NB and will make every effort to attend the Recycle NB-led bi-annual Industry Advisory Committee meetings. EPRA will be pleased to provide a program update on the successes and opportunities for the program while respecting the confidential nature of its contractual relationships.

2.3 Program Details

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

EPRA New Brunswick endeavours to keep regulated electronic products from going to 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 are emphasized in the communications and public awareness investments which I maximize participation in the program.

EPRA will proactively put processes in place to aid Brand Owners in ensuring they meet all regulatory requirements of the program.

The New Brunswick Clean Environment Act, Designated Materials Regulation requires that Brand Owners register with the Board (Recycle New Brunswick) directly. As the subsequent agent for brand owners, EPRA NB will request all EPRA registrants to be sure they fulfill this regulatory requirement between themselves and RNB.

To encourage this, examples of proactive processes that EPRA will continue are:

- Working with RNB to share registration lists in order that RNB can follow up as they feel appropriate with brand owner
- For brand owners that RNB advises EPRA are registered with EPRA and not RNB, EPRA will continue to notify the brand owner that their obligation is to register with RNB per the New Brunswick Clean Environment Act, Designated Materials Regulation, and provide the link to the RNB registration
- Providing brand owners with point of sale materials that educate themselves and the public on the recycling program
- Continuing to advise RNB of brand owners that EPRA becomes aware of who are not complying with the regulatory requirements.

3. Collection, Transportation and Consolidation

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;

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 collects designated program materials in all areas of the province.

New Brunswickers now have access to a network of drop-off sites to provide adequate, appropriate and convenient free of charge drop-off service to the residential and business sectors. EPRA is committed to continue to transport the collected materials in a safe and efficient manner.

EPRA New Brunswick will continue to ensure that the network of drop-off sites is adequate, appropriate and convenient:

- 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.

3.1 Monitoring of the EPRA Collection Network

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.

EPRA ensures that the network of drop off sites are adequate, appropriate and convenient. The EPRA Drop Off Location Agreement defines the minimum operational, environmental, health, safety and data security requirements for the organization seeking to operate as an EPRA collection site; as well as the assessment and approval process.

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.

4. 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;**

Regulatory Requirement

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

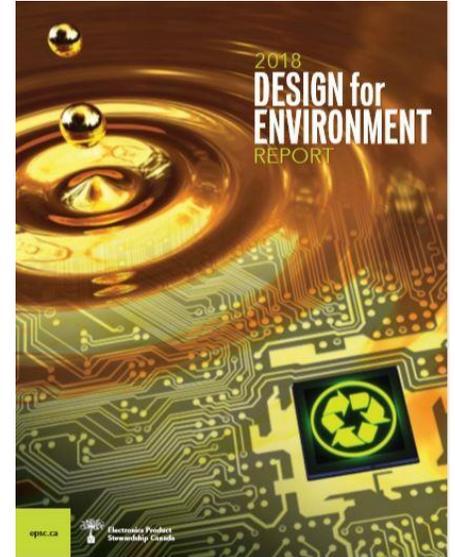
Regulatory Requirement

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

Regulatory Requirement

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

4.1 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 2018 and previous years' editions are available in both English and French here: www.epsc.ca) highlighting 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.



4.2 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 enable the safe and environmentally responsible reuse and refurbishing of electronics. By qualifying not-for-profit and charitable entities who meet the criteria outlined in the program, donors gain assurance that products reused through these organizations will be handled in a responsible manner. Obligated products that are re-used or refurbished will not attract an EHF

4.3 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.

4.4 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 guidelines.

5. 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.

5.1 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 electronics sector is shifting to more mobile, multi- functional and light weight products. This light weighting means less material being introduced into the market which results in less material to collect at end-of-life.;
- The ability for EPRA to find suitable business arrangements with various contractors for the collection of EOLE across the province;

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

6. Program Funding

6.1 The Environmental Handling Fee

The program is funded by an Environmental Handling Fee (EHF) that is levied on sales of new products listed under the Designated Materials Regulation. The EHF allows 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 reflects the true cost of managing that product. The EHF provides sustainable funding for collection, handling, consolidation, transportation, recycling, communications, public awareness, compliance/administration, and environmental audits.

6.2 Setting the Environmental Handling Fee

The environmental handling fee is set by product category. EPRA undertakes regular financial reporting to monitor revenue generated by the program per category 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. The contingency reserve is planned to be in the twelve month (12) operating range of program costs. The EPRA New Brunswick program shall continue to be audited annually by an independent external auditor.

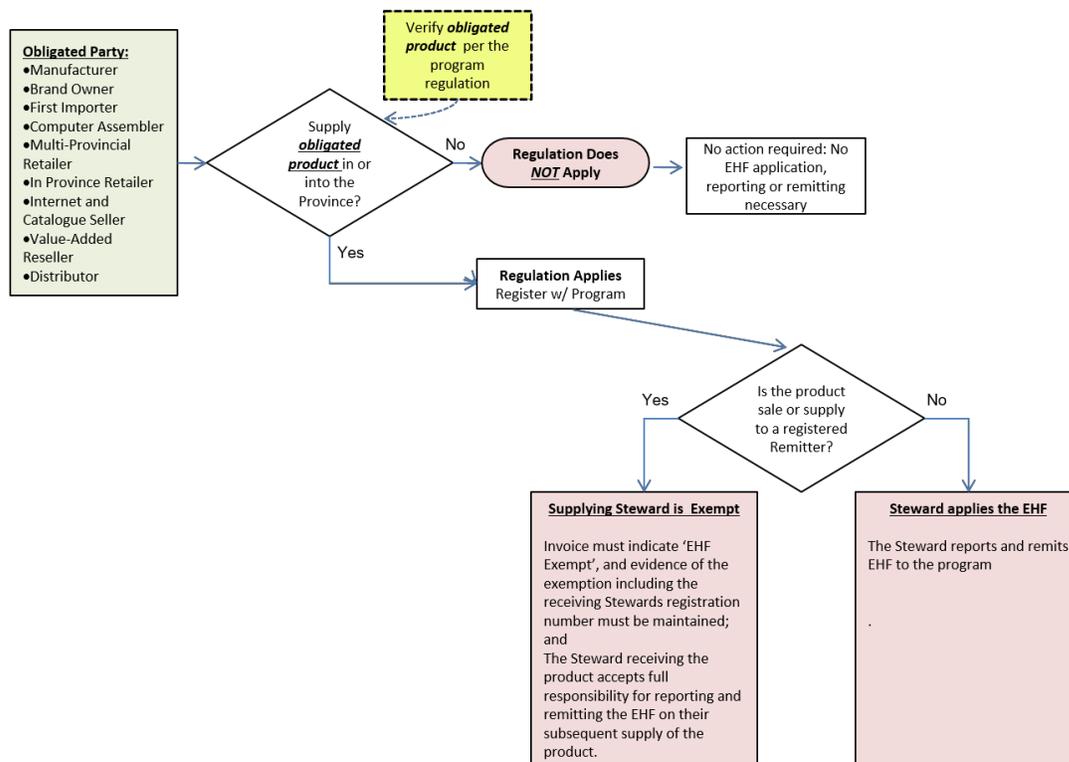
The reserve represents the accumulated surplus or deficit of the Program from inception and is necessary to ensure the program is not destabilized due to increases in operational costs. The current plan is set at one year operating expense. In the event that the reserve exceeds or falls short of the plan, EPRA will consider making adjustments to the EHF rates.

6.3 Environmental Handling Fee Flow

Obligated brand owners, also referred to as stewards, registered under the EPRA plan 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 is 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. EPRA NB will continue to post the RNB URL <https://www.recyclemyelectronics.ca/nb/stewards/registration/> which outlines brand owner obligations and responsibilities on the EPRA NB Steward Web Page.
- Drop-off Centres continue to be well informed regarding electronic products included in the Program and can provide accurate information to customers. Appendix 1.
- Ensure all material to retailers, consumers and information accessible to the public meet the New Brunswick Official Language Act.
- EPRA will follow Recycle NB's "Corporate Identity and Brand Standards Manual".
- EPRA will provide RNB an overview of the annual communication plan by Nov 30th of each year.

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) has been made available for electronic product retailers to order and to display. Examples of these can be found at: <http://epra.ca/epra-communications-and-point-of-sale-materials-atlantic>

One message of primary importance is 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 continue 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. 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. These ads are developed in English and French.

EPRA complies with regulations related to the provision of consumer information. Educational and consumer materials about the program will be submitted to Recycle NB thirty (30) days before release.

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 website continue to be updated on an ongoing basis, clearly outlining 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 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. 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.

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.

8. Audit Systems

<p>Regulatory Requirement</p> <p>(c) information with respect to:</p> <ul style="list-style-type: none">(i) return facilities to be used by consumers,(ii) adherence to established vendor qualification standards;
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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

“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

Criteria for Audits: Detailed audits of remitters (brand owners) are 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 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.

9. Performance Measurements and Continuous Improvement

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;

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.

10. Appendices

This information/forms/training are subject to periodical modifications as business needs change.

Appendix 1



Drop Off Center
Support.docx

Or

On boarding – New Locations

1. The depot is provided with;
 - a. 1- outdoor bilingual sign
 - b. 1- indoor English sign
 - c. 1- indoor French sign
 - d. 15 bags
 - e. 2 boxes of shrink wrap
 - f. EPRA Drop Off Centre Operations Manual (Binder) in the language of their preference.
 - g. Twenty (20) NBD Forms
 - h. Two Hundred –fifty (250) EPRA NB (Orange) shipping tags.
 - i. Fifty (50) Bilingual Brochures
2. EPRA NB Program Director provides in house training.
 - a. How to safely receive and manage electronic material
 - b. How to complete shipping documents
 - c. How to complete invoicing
3. EPRA NB Program Director ensures;
 - a. Signs are displayed and in the right locations
 - b. Completes Safety Check List.



Drop of Center
Inspection Form.docx

Continued Support

1. Annual or Bi Annual visits.
2. Direct access and support EPRA NB Program Director via phone and email.
3. Access and support to local transporter via phone.
4. Ability to order marketing materials directly, <https://www.recyclemyelectronics.ca/nb/resources/communications-materials/>

DROP OFF CENTER INSPECTION FORM

Drop of Center:		ID #:	
Date:		Inspector:	

PREMISES	YES	NO	CORRECTIVE ACTION
Access – entry, exit and parking adequate and hazard free			
Appearance – properly clear of debris/litter			
Building – structure appears in general good shape			
Signage – clearly displayed and in good condition			
Receiving area – adequate, hazard free.			
Storage area - secure			

EQUIPMENT AND PRODUCT	YES	NO	CORRECTIVE ACTION
Bags – are in good repair and adequate supply			
Shrink wrap – proper use and adequate supply			
Paper work – proper use and adequate supply			
Forklift/pallet jack – in good repair			
Bags – build level and full to the top			
Product collected – appears acceptable and intact(safe handling)			

Non program items – minimal or no evidence			
Product storage – sheltered and secure area			

DROP OFF CENTER INSPECTION FORM

Security – Check All that Apply	
Gated Perimeter Fence	
Lighting Motion Sensor	
Surveillance Cameras	
Alarm system	
Other	

Corrective

Action: _____

EPRA Signature: _____

Drop off center Signature _____