



# Return to Retail (R2R) Incentive Program Newfoundland & Labrador

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## 1.0 Background

The **Return-to-Retail (R2R) Incentive Program** provides a consistent and harmonized solution for qualified EPRA steward retailers to collect regulated End-of-Life-Electronic (EOLE) products and work with processors who are verified by the Recycler Qualification Office (RQO) to transport and responsibly recycle these materials. This will:

- 1.1. Allow the reporting of these items and their associated volumes within the respective EPRA Program.
- 1.2. Provide the R2R Retailer, as a generator of End-of-Life-Electronics (EOLEs), the opportunity to collect and responsibly recycle the EOLEs.
- 1.3. Allow the R2R Retailer and Processor to negotiate compensation for the material collection and for services not provided within the respective EPRA Program.

Under the R2R Program, Retailers who have been registered in the program must contract with an RQO-verified processor to provide transport and recycling of program materials. The Processor will be paid by the program. Processors may obtain R2R incentive rates by contacting the Program Director.

The recycling and transportation rates paid to the Processor are subject to change at the discretion of EPRA without prior notice.

## 2.0 Principles

- 2.1. Level playing field – all qualified EPRA steward retailers (small and large, corporate and independent) can join the R2R Program.
- 2.2. Flexibility for R2R Retailers to:
  - Select from RQO-verified Processor partners to ensure responsible recycling
  - Match pick up and shipping schedules to individual retailer needs.
  - Customize solutions, such as core logistics (e.g. use of pallets, super-bags or other type of container)

- 2.3. Recognizes unique circumstances that Retailers may have when collecting End-of-Life Electronics and shows flexibility on issues such as administration, load size, hours of operation, etc.
- 2.4. Harmonized, consistent approach that reflects regional costs (e.g. transportation costs in more rural and remote areas)
- 2.5. Provides for voluntary participation and ability to ramp-up/pilot in selected jurisdictions
- 2.6. Allows for enhanced collection of program-eligible products only
- 2.7. Provides for reasonable operational and financial controls
- 2.8. Provides simplicity for R2R Retailers who participate

### 3.0 Applicability

The **R2R Program** applies only to approved R2R Retailers and Processors. For the purpose of this program, R2R Retailers are limited to those who meet the following criteria:

- (a) Fully registered and in good-standing as EPRA Stewards, as a Remitter or Pay-on-Purchase (POP) in the province where they wish to offer an R2R service, and;
- (b) Offer a 'Return-to-Retail' option to customers. The scope of this program does not extend to ICI-generated materials such as in-house IT equipment.

All materials must have been generated as an EOLE within the associated program jurisdiction. It does not include volumes that may be generated outside of the province and shipped into the province for EOLE management, and also does not include volumes intended for re-use, refurbishment or other re-marketing.

### 4.0 Application Process

The **Return to Retail (R2R) Incentive Program Application Form** (Appendix A) must be completed by each potential retailer, indicating the RQO-verified Processor with whom they have contracted. The completed application form can be submitted for approval by mail to:

Terry Greene  
Program Director-Newfoundland and Labrador  
P.O. Box 14133 Manuels Stn Main  
Conception Bay South, NL, A1W 1A0

Applications can also be submitted by email to: [terry.greene@eprassociation.ca](mailto:terry.greene@eprassociation.ca).

Once the application is approved, the R2R Retailer will be assigned a Generator Code that must be used by the R2R Retailer in all documents accompanying the directly-shipped material.

## 5.0 Shipping

The registered R2R Retailer will initiate a request for direct shipping by contacting the RQO-verified Processor with whom they have contracted.

The Processor will obtain the necessary information on direct-shipped material upfront when the request is initiated. The Processor will arrange and pay for shipment of the material and will also be responsible for providing a copy of the Bill of Lading to the EPRA Program Director at the time of invoicing.

## 6.0 Invoicing, Tracking, Reporting and Verification

R2R invoicing from Processors will be completed on documents separate from other program invoicing.

The amount of product invoiced will be divided into the following categories:

- Display Devices (TVs and Monitors)
- CPUs (Desktop and Laptop Computers, Tablets, etc.)
- All other Regulated Products (Desktop Printers, Keyboards, Mice, Cables, etc.)

A picture must be taken of any container, bag or pallet weighing more than 350 kg and forwarded to the EPRA Program Director with the invoice package. There may be other audit, sampling or reporting requirements to verify material composition.

It is solely the responsibility of the Processor to ensure that **ONLY** program-authorized material is invoiced to the program and that all material meets the requirements outlined in Section 3.0. Processors are subject to removal as a registered EPRA Program Processor if it is determined that EPRA is invoiced for non-program material either through abuse or neglect by the Processor.

The local EPRA Program Director will track all reported data and assess the data for any inconsistencies. The Program Director will confirm:

- The number of containers, bags or pallets approved for shipment, transported and received
- The weight of containers, bags or pallets and quantities of materials contained on each
- All materials have been processed

The Program Director will also assess:

- The total container, bag or pallet weights-to-program averages
- The amount of non-program materials included in container, bag or pallet
- The amount of packaging and other materials included in the container, bag or pallet

## 7.0 Applicable Documents

By signing the **Return to Retail (R2R) Incentive Program Application Form** (Appendix A), the R2R Retailer confirms that all information provided is accurate and agrees to permit auditing by EPRA, with reasonable notice, to verify the amounts shipped.

## 8.0 Verification Audit

At the Program Director's discretion, or where s/he is unable to verify data reported or identifies inconsistencies in reporting, EPRA may initiate a detailed audit of the shipment. EPRA reserves the right to audit the participating R2R Retailer and Processor to confirm the process for:

- Identifying the origin of materials
- Tracking and separating program-applicable materials
- Reporting volumes to the program

## 9.0 Processor Incentive

In the event that the verification process is unable to clarify earlier identified inconsistencies, or identifies further inconsistencies, in material tracking or reporting, EPRA will notify the Processor of the issues and provide the Processor with 30 days to provide satisfactory resolution to the outstanding issues. If the outstanding issues remain unresolved, the Processor's registration in the R2R Program may be revoked.

Processors must provide the following documents to receive compensation for their recycling and transportation costs:

- A detailed invoice respecting the product categories outlined in Section 6.0
- A copy of the signed Bill of Lading corresponding to each shipment from the R2R Retailer to the Processor and clearly stating the R2R Retailer's Generator Code

If documents are missing and/or do not provide the required information, the package will be refused and returned to the Processor and the processor incentive for the direct shipping and recycling will not be approved.

The Processor is responsible for all costs associated with the direct shipment of material including shipping and logistics costs as well as all processing and supplies. Types of collection, infrastructure (e.g. pallets, containers, bags, etc.) and other value-added service costs are to be negotiated strictly between the Processor and the R2R Retailer.

Only after confirmation of shipment and processing of the material, and verification of program applicable volumes, will EPRA provide the Processor with a transportation and processing incentive (per metric tonne) for the program material processed.

No incentive will be paid on inconsistently reported and unverified amounts, or on packaging weights and non-compliant program materials.