



End-of-Life Electronics Stewardship Program for Prince Edward Island

Submitted to: **PEI Department of Communities, Land & Environment**

Submitted by: **Electronic Products Recycling Association**

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1. Introduction

Electronic Products Recycling Association (EPRA) is pleased to submit this amended version of our approved End-of-Life Electronics (EOLE) Stewardship Program for Prince Edward Island (PEI).

EPRA is a not-for-profit association and 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 outlines revisions to our Electronic Stewardship Program Plan to divert certain unwanted and end-of-life (EOL) designated electronic products from disposal, as required by the Materials Stewardship and Recycling Regulations under the auspices of the Environmental Protection Act.

EPRA, and its predecessor ACES, has operated a successful regulated electronics recycling program in PEI since July of 2010 and have collected over 2,800 metric tonnes of waste electronics from our six Drop-Off Centres in the province.

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. These two benefits will be emphasized in the communications and public awareness strategy which will maximize participation in this stewardship program.

An up-to-date listing of products addressed by this plan can be found at:
www.recycleMYelectronics.ca/pei

The stewardship plan for Prince Edward Island is based on a shared responsibility model where brand owners, retailers, consumers, and government all have a role to play.

Brand owners are responsible for providing the collection and recycling program that will manage all electronics waste (e-waste) items identified in the Province's Materials Stewardship and Recycling Regulations.

Stewards are responsible for ensuring that an Environmental Handling Fee (EHF) is applied to new electronics items designated in the Regulations and remitting the funds to the program administrator to cover all aspects of the program, including collection, transportation, recycling, public awareness and administration. EPRA will audit stewards for compliance with all aspects of the agreements and program requirements.

Parties purchasing electronics pay the EHF on these designated new electronics items at the point-of-purchase. Consumers and businesses will be able to drop-off their e-waste items at a designated drop-off site without charge and with assurance that these items will be recycled responsibly. The ICI

sector will also have the option of scheduling drop-offs for large quantities of e-waste. Contracted recyclers for the program all meet the Electronics Recycling Standard (ERS).

Government (PEI Department of Communities, Land & Environment) will be responsible for enforcing the Regulations and ensuring full program compliance.

An alternative stewardship plan for mobile cellular devices submitted by the Canadian Wireless Telecommunications Association (CWTA) was approved by PEI Department of Communities, Land & Environment; therefore the EPRA plan does not manage the end-of-life solution for those products at this point in time.

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 brand owners;
- 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 Prince Edward Island 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 full public transparency for financial and environmental reporting.

4. Management Structure of the Program

All activities associated with the program fall under the auspices of the EPRA Atlantic Canada Executive Director and management team, including the PEI Program Delivery Manager.

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. This committee has representatives from PEI, NS & NL who are familiar with the electronics & recycling industry. Regulatory staff from the three provinces are invited to attend as observers and the committee meets twice per year.

4.2 Local Program Delivery Manager

EPRA has an established agreement with Island Waste Management Corporation to act as the Local Program Delivery Manager. This Agreement covers the following responsibilities:

- Establishing and maintaining a drop-off centre network for the program in PEI;
- Establishing and maintaining the infrastructure for transportation and consolidation of materials collected from the drop-off centre network;
- Overall day-to-day management of the collection and transportation network on PEI.

In exercising its responsibilities, the Local Program Delivery Manager reports to the EPRA Executive Director, Atlantic Canada as required.

Whereas the PEI program is expected to continue with no specified end date and the contract between the Local Program Delivery Manager and EPRA will have a specified end date, any decision to extend the contract or seek a Local Program Delivery Manager through a competitive bid process prior to contract expiration, shall be at the discretion of EPRA.

5. Program Details

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

5.1 Collection, Transportation and Consolidation

EPRA management working in concert with the Local Program Delivery Manager, will:

- Collect program materials in all areas of the province;
- Use a network of drop-off sites to provide adequate, appropriate and convenient free of charge drop-off service to the residential and ICI sectors. A minimum of six (6) sites have been selected and their locations are outlined in **Appendix B**;
- Transport the collected materials.

To ensure that the proposed network of drop-off sites is adequate, appropriate and convenient, EPRA has established the following criteria for service:

- Sites in Charlottetown and Summerside shall be strategically located to ensure that the majority of PEI 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 ICI sector.
- All drop-off sites shall accommodate scheduled drop-offs of large quantities of program materials from the ICI sector.

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 on Prince Edward Island.

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 Executive Director or Local Program Delivery Manager to be addressed or researched.

With respect to geographic/population coverage, EPRA will continue to conduct regular reviews to ensure the network meets the needs of Prince Edward Island residents. To ensure adherence to the criteria for service, a regular mapping exercise will be commissioned by EPRA which will keep actual versus targeted reach measurements current and identify any service gaps.

5.5 Incidental Municipal Collection

All incidental municipal collection is handled by Island Waste Management Corporation (IWMC) and they are contracted as the EPRA PEI Local Program Delivery Manager. All electronic waste regulated under the EPRA program will be handled by IWMC during the life of the agreement.

5.6 Voluntary Return to Retail Program

EPRA offers a voluntary Return to Retail program that is available to all stewards who are in good standing with our stewardship plan. The Return To Retail Program Guidelines and Application Form are available on our website at www.recycleMYelectronics.ca/pe . EPRA will make retailers aware of the program's benefits

6. Program Funding

6.1 The Environmental Handling Fee

The program is funded by an Environmental Handling Fee (EHF) that is levied on new product sales designated by the Materials Stewardship and Recycling Regulations. The EHF will allow consumers and the ICI sector 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 ICI sector will have the option of scheduling drop-offs for large quantities of e-waste.

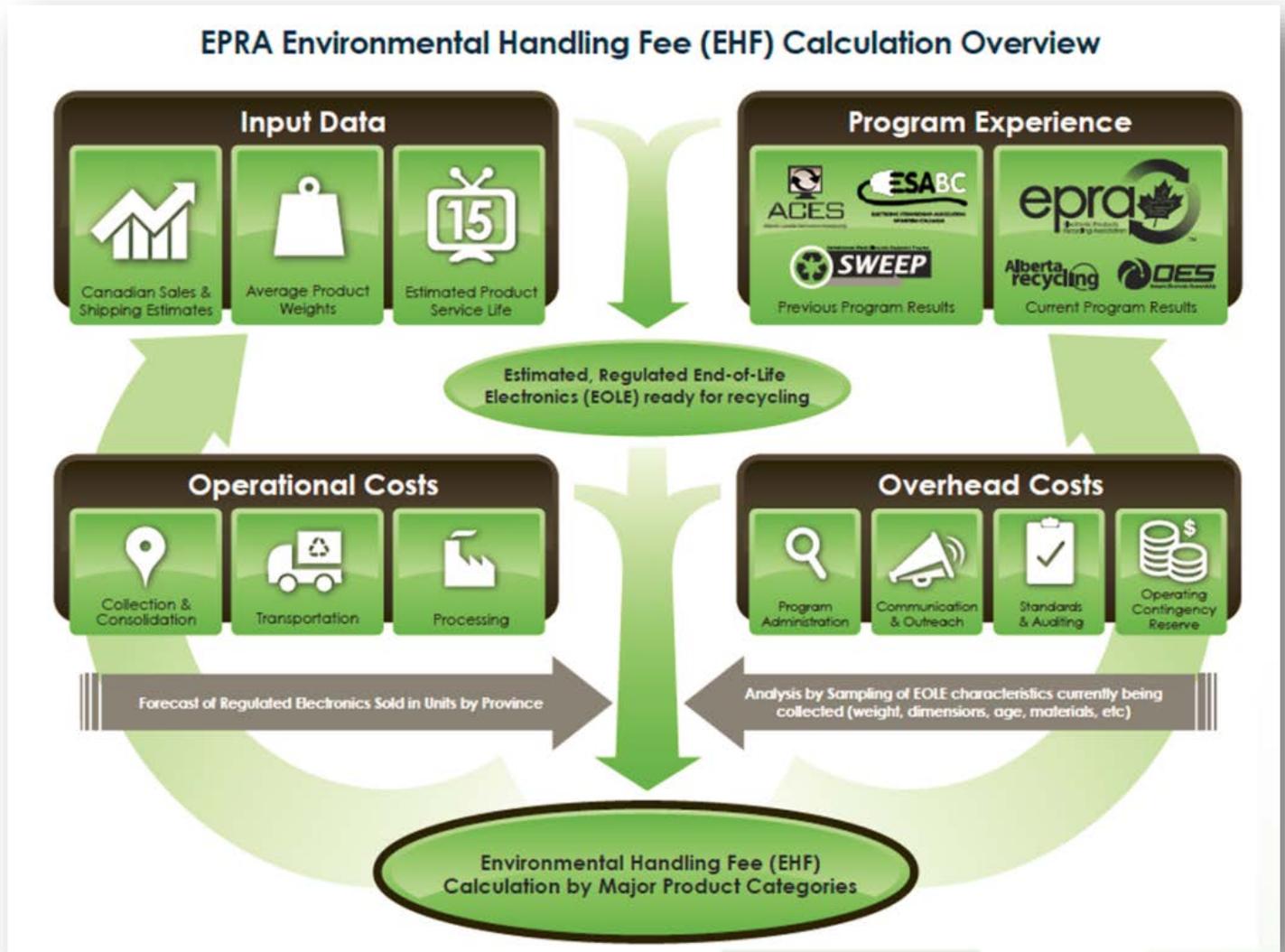
The EHF for each product designated by regulation will reflect the true cost of managing that product. The EHF will fund:

- Collection, handling, consolidation, transportation and recycling;
- Communications;
- Public Awareness;
- Administration expenses;
- Environmental audit expenses; and
- Compliance and enforcement provisions in support of regulations and those required over and above government measures.

6.2 Setting the Environmental Handling Fee

Rather than a single flat fee set across all electronics products designated by the Materials Recycling Regulations, the 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. The PEI program shall be audited annually by an independent external auditor.



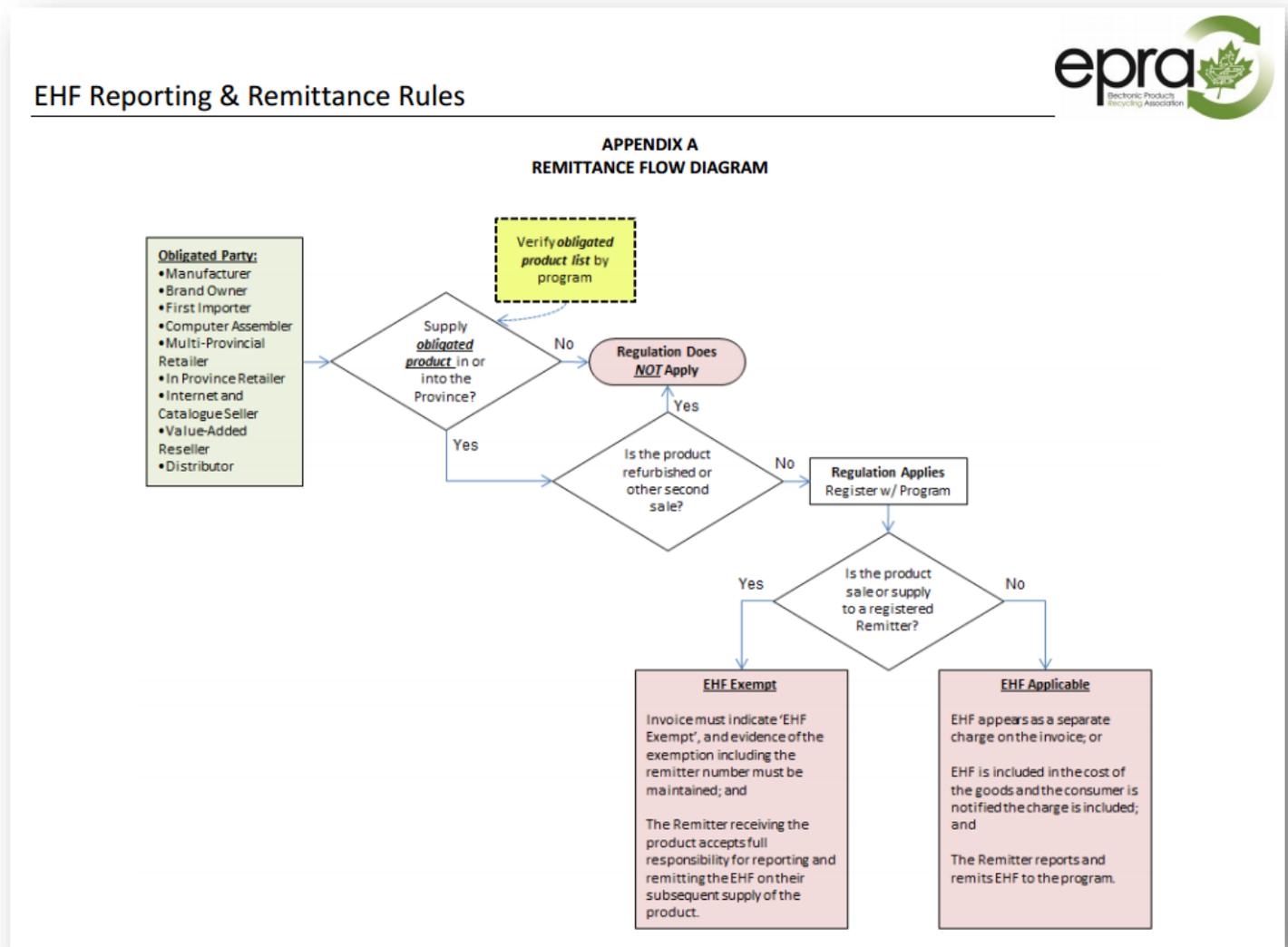
6.3 Funding Flow

Obligated brand owners 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 brand owner will be classified as either a "Remitter" or "Pay-on-Purchase" (POP) member. While a Remitter would usually be a larger entity (e.g. manufacturer, national retailer or distributor), they can also be a small, Prince Edward Island-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 member

This funding flow is outlined in **Figure 1** and ownership of the program fund is retained by EPRA.

Figure 1: Steward Application of the EHF



7. Communication and Public Awareness

7.1 Communication Goals

The focus of the communications plan is two-fold: to continue to create awareness on Prince Edward Island about the Electronic Stewardship Program and to ensure that brand owners and retailers of regulated products have the opportunity to fulfill their obligations under the Materials Stewardship and Recycling Regulations via membership in EPRA. The communications plan requires very clear messaging to all Program stakeholders. The goals of EPRA's communication activities are to:

- Ensure residential and business consumers 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 PEI;
- Ensure EPRA Drop-off Centres continue to be well informed regarding electronic products included in the Program and can provide accurate information to customers; and
- To minimize the level of incidental waste and clarify the roles of the various stakeholders regarding this issue (i.e. EPRA, Local Program Delivery Manager, businesses, residents and waste haulers).

7.2 Communication Components

All existing communication materials are appropriately informative to facilitate education and awareness for consumers and businesses of the EPRA PEI Program. EPRA will continue to provide signage to the network of Drop-off Centres. Promotional material (for example brochures and tent cards) will be made available for electronic product retailers to order and to display at the point-of-sale. 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 PEI Drop-off Centres with the assurance that they will be responsibly recycled.

In its efforts to minimize the impact of incidental municipal collection (Section 5.5), rejection stickers will be provided to allow IWMC and private haulers to tag and leave electronic waste at the curb.

Media campaigns will be utilized to convey information about the EPRA PEI Program. Examples of the primary components of the campaign would be radio, print and online advertisements. For example, in 2014, EPRA launched a new national consumer facing brand campaign that was promoted in the province with PEI 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 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 PEI 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.

Examples of our ads can be viewed at:

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

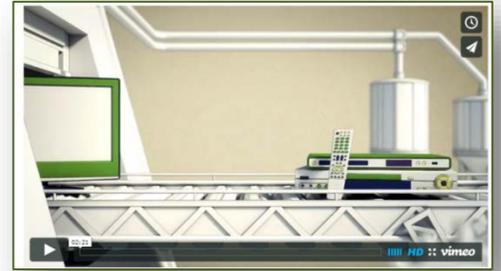
Public opinion polling is also conducted on an annual basis to determine awareness of electronics recycling in the province and this information will be outlined in EPRA's Annual Report.

The EPRA PEI website was 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 and downloading on the EPRA PEI 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 at:

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



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 at:

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



The EPRA toll-free helpline service will continue to accommodate inquiries from Prince Edward Island 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 PEI specific calls. Both English and French staff are available.

8.0 Audit Systems

EPRA had 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, random selection and with the plan that all remitters are audited at some point within a 5 year period.

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.

Where a processor changes its processing technology and/or downstream processors, they are also subject to re-audit to ensure any and all changes conform to the ERS.

8.3 Performance Measurements and Continuous Improvement (Appendix C)

EPRA has committed to annually report these recommended core set of measurements:

Indicator

Operational	✓ Total WEEE Collected (tonnes) ✓ Total WEEE Collected per Capita (tonnes)
Financial	✓ Total Program Costs per Tonne
Accessibility	✓ Percent of Population Covered by Collection Sites ✓ Total Collection Sites
Awareness	✓ Percentage of Population Aware of the Program

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

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 & Operations

Jay Illingworth, National Director, Harmonization

APPENDIX B

EPRA Drop-off Centres and Consolidation Locations:

City/Town	Civic Address	Phone
Brockton, West Prince	2202 Dock Road Route # 150	853-8619
EPWMF, Wellington Centre	29786 Route # 2	854-3636
New London, Central	10142 Route #6	886-7425
Greensle, Charlottetown	7 Superior Crescent	368-3848
Dingwells Mills, North Kings	100 Selkirk Road, Route #309	687-7025
Murray River, South Kings	378 Cape Bear Road, Route #18	962-7423

Reference: See map below for an accurate visual of geographic coverage and population reach referenced in the tables above and in Section 6.1



APPENDIX C

2013 Performance of EPRA Programs Across Prince Edward Island:

