



Reference: 412266

September 27, 2024

Craig Wisehart, Executive Director
Electronic Products Recycling Association
100 – 4259 Canada Way
Burnaby BC V5G 4Y2
Craig.Wisehart@EPRA.ca

Dear Craig Wisehart:

Thank you for submitting the Electronic Products Recycling Association (EPRA) British Columbia Extended Producer Responsibility Plan (the “plan”) initially on December 16, 2021, in fulfillment of the requirements of Part 2, Section 6 of the [Recycling Regulation](#) (the “regulation”) made under the [Environmental Management Act](#). The most recent revision of the plan submitted by EPRA on September 9, 2024 is attached to this letter.

I acknowledge the efforts of EPRA and the ongoing dialogue between EPRA and the Extended Producer Responsibility (EPR) section staff to develop revisions and improvements to the plan to better meet the requirements of the regulation.

Under the regulation, the director, otherwise known as the Statutory Decision Maker (SDM), has the ability to approve an extended producer responsibility plan submitted under section 4. I have completed my review of the submitted plan, and EPRA’s revisions of the plan in response to the proposed amendments as outlined in my preliminary decision letter of August 15, 2024.

Prior to the issuance of this decision letter, EPRA was provided with feedback on the proposed plan amendments and has had the opportunity to propose further amendments or provide additional information for consideration. While EPRA has addressed many deficiencies, certain components remain outstanding.

Please be advised that, pursuant to section 5(5) of the regulation, I approve the amendments to the plan proposed by EPRA in the revision of September 9, 2024, and in addition to the proposed amendments approved by me in this letter, I am further amending the plan, pursuant to section 5(5) of the regulation, to address the following deficiencies.

1. Collection System and Consumer Accessibility

Recovery Rate

The plan states that “EPRA uses alternatives to a recovery rate to track performance.” However, these alternatives for a recovery rate are not clearly identified in the plan nor is it evident how they adequately track program performance. EPRA’s 2022 annual report states that 13,388,851 units were sold into B.C. and that 13,010 metric tonnes were collected. It remains difficult to ascertain what estimated portion 13,010 metric tonnes represents in relation to that which is available to collect in B.C. I recognize that estimating a recovery rate by counting the amount of product collected against the amount sold could be challenging for EPRA. However, adequate assessment of the program’s performance and reporting each year are requirements of Sections 5 and 8 of the regulation. For example, EPRA could establish an estimated capture rate by estimating average weight sold into B.C. over the preceding number of years and comparing that to weight collected.

To indicate how program performance will be tracked to ensure continuous improvement, I am amending the plan to require that EPRA commit to:

- i. Complete a study determining the feasibility of calculating a recovery rate/capture rate or propose a suitable alternative to recovery rate/capture rate to better assess overall program performance, and provide this completed report on the study to the ministry by March 31, 2026. Either a recovery rate or capture rate must then be reported on annually starting in 2027 to assess plan performance.

Furthermore, if the findings do not support the feasibility of a recovery rate/capture rate upon completion of the study, then the following is required:

- ii. EPRA must propose and justify an alternative measure(s)/target(s) to assess plan performance by March 31, 2026, and that the alternative measure must be reported on annually starting in 2027, to effectively assess plan performance.

2. Management of Environmental Impacts

Recycling Efficiency Rates (RER)

To eliminate or reduce environmental impacts of the program, RERs and RER targets should be reported on, in an effort to maintain and/or improve RERs over time. I acknowledged that the processors determine the RERs, however EPRA is able to select the downstream processors. Reporting on RERs and RER targets allows for the assessment of performance with respect to the batteries found in many of EPRA’s products.

RER targets are important for EPRA to strive for continuous improvement, and to eliminate or reduce environmental impacts of the program pursuant to Part 2, Section 5(1)(c)(vii) of the regulation.

I am amending the plan to include the following statement:

- i. “EPRA must track the RER and the RER target performance by battery chemistry type starting on January 1, 2026, and must report on these metrics in its 2026 annual report. EPRA commits to report annually on the RER and the RER target performance percentage range by battery chemistry for each chemistry type that EPRA manages, in accordance with the following targets:

Battery Chemistry	RER Target
Alkaline, Carbon Zinc, Zinc Air	75% - 95%
Lithium	50% - 65%
Nickel Cadmium (Ni-Cd)	65% - 80%
Nickel Metal –Hydride (Ni-MH)	70% - 85%
Lithium Ion (Li-Ion)	70% - 95%
Small Sealed Lead Acid (SSLA)	70% - 95%

To ensure consistency, I am amending the Performance Monitoring and Reporting Commitments section of the plan to read:

- ii.

Metrics	Performance Targets and Reporting Commitments
Report annually on the RER and RER target performance by battery chemistry	Reporting Commitment Annually

Ministry Expectations

The ministry expects continuous improvement across all future plans and amendments submitted by EPRA. These include the following areas of concern, for EPRA’s consideration:

A. Producers Paying the Cost

The plan states that EPRA’s program is fully covering the costs of the collection and management of program materials which is based on the BDO cost study represented by 37 depots and five onsite visits conducted in 2019. I recommend continuing pre-engagement with depots in advance of developing future cost study models to gain greater representation.

To provide for producers paying the cost, as required by the regulation, Part 2, Section 5(1)(c)(i), Section 8 of the plan must be transparent and detailed enough to enable interested parties to clearly determine implications to their interests. The plan includes a list of variables for calculating the compensation for contracted depots but does not present further detail on the compensation rate methodology. While a list of variables to be considered is presented and EPRA mentions that BDO Consulting was contracted to conduct a compensation study, there is no detail on how these variables were used to arrive at compensation in the plan.

For the next plan iteration, I recommend that the compensation rate methodology be presented as the steps taken/methods used, in a step-by-step description (e.g., a step-by-step process for how compensation will be calculated; whether a variable was averaged, which factors are considered, etc.) which will allow interested parties to determine implications to their interests. More information is included in the recently-updated guidance document [Paying the Costs under Recycling Regulation Section 5\(1\)\(c\)\(i\) and Dispute Resolution Guidance 2024](#).

B. Consultation

Moving forward with consultation, EPRA is expected to consider advertising more widely to reach a broader audience, and include extensive efforts towards informing Indigenous communities and governments of the EPRA program and impacts, including informing the Indigenous Zero Waste Technical Advisory Group as a method to reach a broad Indigenous audience.

In addition, it is recommended in the Recycling Regulation Guide (2012 version) that four webinars be held online during the consultation period. It is noted that EPRA conducted a total of two webinars. A greater number of opportunities to attend and provide feedback would afford further flexibility for interested parties to participate in future consultations. Please note that if an updated version of the Recycling Regulation Guide 2012 is available at the time of your next plan review, it is expected that the updated guidance will be followed.

Reporting Expectations

The ministry expects this approval letter to be forwarded to EPRA's board of directors as well as its member producers, since each producer is responsible for ensuring its agent fulfills the plan, and compliance proceedings may be taken against a producer if the agent fails to implement the plan.

Third Party Assurance for Non-Financial Information in Annual Reports

Third party assurance for non-financial information in Annual Reports is required through Section 8(2)(h) of the regulation. The assurance report should be completed in accordance with the document entitled, "Third party assurance for non-financial information in annual reports" dated November 2022 and revised from time to time, which is enclosed.

Additionally, please be advised, under Part 2, Section 8(2)(h) of the regulation, the director can specify any other information required in the annual report. To ensure the continuity of all performance measures, performance requirements, and targets in the plan, reporting on each of these metrics will be maintained until they are superseded by an approved plan renewal.

Next Plan Review Due Date

Section 6 of the regulation requires a plan review every five years. As per this requirement, EPRA must review its approved plan, conduct consultation with interested parties, and submit proposed amendments to the director, or notify the director in writing that no amendments to the plan are necessary, by **December 18, 2026**. Guidance on this process can be found on the Extended Producer Responsibility webpage at: [Extended Producer Responsibility - Province of British Columbia \(gov.bc.ca\)](https://www2.gov.bc.ca/gov/content/industry/epres/epres.htm).

Right to appeal

If you disagree with this decision, Division 2 of Part 8 of the *Environmental Management Act* provides for appeal of my decision to the Environmental Appeal Board (EAB). In accordance with the *Act* and with the Environmental Appeal Board Procedures regulation, the EAB must receive notice of the appeal no later than 30 days after the date you receive this decision. For further information, please contact the Environmental Appeal Board at (250) 387-3464.

Thank you for your efforts on this plan, and I appreciate EPRA's continued commitment to achieving compliance in this regard. If you have any questions regarding the implementation of the plan, please contact me at andreas.wins-purdy@gov.bc.ca or through the Extended Producer Responsibility inbox at ExtendedProducerResponsibility@gov.bc.ca.

Sincerely,



Andreas Wins-Purdy, P.Ag.
Director, Extended Producer Responsibility, Program Delivery
Authorizations and Remediation Branch
Environmental Protection Division

cc: Douglas Hill, Executive Director, Authorizations and Remediation Branch,
Doug.Hill@gov.bc.ca
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Initiatives Branch, Tess.Rouse@gov.bc.ca.
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Jay Illingworth jay@epra.ca

Enclosure:

EPRA BC EPR Plan, submitted September 9, 2024.
Third party assurance for non-financial information in annual reports, November 2022.



EPRA BC EPR Plan

Submitted to: BC Ministry of Environment and Climate Change Strategy,
Extended Producer Responsibility Section
PO Box 9341, Stn Prov Govt
Victoria, BC V8W 9M1

Prepared by: Electronic Products Recycling Association
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List of Abbreviations

C2R	Call to Recycle
CWTA	Canadian Wireless and Telecommunications Association
CWMA	Coast Waste Management Association
DfE	Design for Environment
EHF	Environmental Handling Fee
EOLE	End of Life Electronics
EPR	Extended Producer Responsibility
EPRA	Electronic Products Recycling Association
EPSC	Electronics Product Stewardship Canada
ERRP	Electronics Reuse and Refurbishing Program
ERS	Electronics Recycling Standard
ICI	Industrial, Commercial & Institutional
LAC	Local Advisory Committee
NGO	Non-Government Organization
RCBC	Recycling Council of British Columbia
RCC	Retail Council of Canada
SABC	Stewardship Agencies of B.C

1. Introduction

Electronic Products Recycling Association (EPRA) is pleased to submit our Extended Producer Responsibility (EPR) Plan to the British Columbia Ministry of Environment & Climate Change Strategy, pursuant to the requirements of the British Columbia (BC) Recycling Regulation (“Regulation”) under the *Environmental Management Act* which sets out the requirements for extended producer responsibility, including the requirement for EPR plans. This EPR Plan replaces the current EPRA BC Product Stewardship Plan approved by the Ministry on November 6, 2018.

2. Duty of Producer

Section 2(1) of the Recycling Regulation requires a producer to have an approved plan under Part 2 [Extended Producer Responsibility Plans] and comply with the approved plan with respect to a product in order to use in a commercial enterprise, sell, offer for sale or distribute the product in British Columbia.

3. Appointment of EPR Agency

Sections 2 of the Recycling Regulation provides:

- (2) *If a producer appoints an agency to carry out duties of the producer under Part 2 on behalf of the producer, the producer, before the agency begins to carry out those duties, must notify the agency in writing of the appointment, specifying the duties under Part 2 that the agency will perform on behalf of the producer.*

- (3) *Before an agency begins to carry out duties on behalf of a producer, the agency must*
 - (a) confirm in writing to a director the duties under Part 2 that the agency will perform on behalf of each producer that has joined the agency, and*
 - (b) comply with Part 2 in respect of the duties referred to in paragraph (a).*

- (4) *On the request of a director, an agency must provide the director with either or both of the following:*
 - (a) a list of producers the agency currently represents;*
 - (b) a copy of any notification the agency received under subsection (2).*

EPRA, a national not-for-profit organization incorporated to manage regulated recycling programs across Canada, is chartered with ensuring regulatory compliance. EPRA was established to assist its producers in fulfilling their obligation to establish collection and recycling programs under applicable provincial EPR legislation.

EPRA is incorporated under the Canada Not-for-Profit Corporations Act and is governed by a Board of Directors. A link to the program’s Federal Corporation Information is available at:

<https://www.ic.gc.ca/app/scr/cc/CorporationsCanada/fdrlCrpDtIs.html?corpId=7838409>

The EPRA Board of Directors effective December 31, 2023 is as follows:

Maja Czubernat	Samsung Electronics Canada Inc.
Chris Gouglas	Best Buy Canada Ltd.
Cheryl Quigley	Sony Canada
Carleen Hall-Barnes	Dell Canada
Kristyn Rankin	Apple Canada Inc.
Giro Rizzuti	Costco Wholesale Canada
Steve McEwen	Staples Canada Inc.
Nick Curalli	London Drugs Limited

A list of the EPRA Board Directors is published yearly in the EPRA Annual Report, available at:

<https://recyclemyelectronics.ca/bc/regulations-and-approved-plan/governance>

EPRA’s Annual Report will report on significant changes to the organization’s structure or governance if they occur.

EPRA operates a program in British Columbia for regulated electronic, other products and is responsible for overseeing the Program on behalf of its producers, who are defined by the Regulation as the producers. The Program operates according to the bylaws approved by the Board of Directors (Board) to manage the affairs of the Association. The Board has the responsibility for the overall stewardship of the organization and establishing the overall policies and standards for the organization. The program has been operational in BC since August of 2007.

Each of the Program’s producers appoint EPRA as their EPR agency as described in section 2(2) of the Regulation. EPRA supports and reports on the range of pollution prevention elements on behalf of its producers, including conducting awareness campaigns on these priorities, *Design for the Environment* reporting, website information and education modules that are free and publicly accessible. For those units requiring recycling, EPRA provides collection services throughout the province and ensure responsible recycling of those products collected.

EPRA BC represents approximately 1700 producers for the products identified in our program Plan. A list of EPRA’s producers is available at:

<https://www.recycleMYelectronics.ca/bc/stewards/registered-stewards-remitters-pops/>

EPRA exercises due diligence in identifying and pursuing free riders to encourage a level playing field for all producers. Information about the Program is available to producers on our website at:

<https://recyclemyelectronics.ca/bc/what-is-a-steward>

Effective October 1, 2024, CESA (the program for small appliance and power tools) will cease to operate and the producers from that program will transition to EPRA for compliance with the recycling regulations in BC. This change will not impact the structure or governance of EPRA.

EPRA chairs a Local Advisory Committee (LAC) to foster the exchange of information on our program and as a forum to discuss issues of local concern. This committee has BC based representatives who have experience with the electronics and recycling industry. Committee members are selected by the Executive Director and form a representative group that is knowledgeable of the industry and can provide meaningful input on the program. The LAC members draws on representatives from the local government, NGO's, local retailers and other relevant parties. Currently the committee meets twice per year.

4. Program Products

Section 4 of the Recycling Regulation provides:

A producer must submit an extended producer responsibility plan, at the time specified in the applicable Schedule, if any, and in a manner and format satisfactory to a director, for the products within the product category of the product the producer sells, offers for sale, distributes or uses in a commercial enterprise in British Columbia.

The Program includes a wide array of electrical, electronic and other products including, but not limited to desktop and portable computers, printers, display devices, audio video products, telephones, medical devices, IT & telecom equipment, testing & control instruments and electronic toys as defined in Schedule 3 of the Regulation. This includes electronic accessories for these products. The Program also covers 'orphaned' products in these categories where the manufacturer may no longer be in business. EPRA is not the only EPR agency covering electronic or electrical products. Other agencies handle some of the products in this category.

In addition, effective October 1, 2024, products previously included in the CESA program will be included under the EPRA EPR plan. These include an array of small appliances, power tools and other products including but not limited to appliances (kitchen countertop, garment care, air treatment, personal care, floor cleaning), microwave ovens, time measurement/display devices, weight measurement devices, sewing/textile machines, power tools (handheld, benchtop, test/measurement), exercise machines and sports/leisure/arts/hobby devices).

A more detailed listing of the covered product categories is provided in Appendix A. In addition, there is a detailed list of products accepted within this Program available on our website at:

<http://recycleMYelectronics.ca/bc/what-can-i-do/recycle-what/>

At the time of filing, EPRA and other EPR programs accept small household batteries into their programs. EPRA manages batteries that are sold in or packaged with obligated electronics for which EPRA handles the collection and recycling. These embedded batteries are considered components of the electronic products and are therefore included in our program. EPRA will coordinate activities with the other programs managing batteries under the *Electronic and Electrical* product categories.

Currently EPRA and Call2Recycle both have programs for eTransport products. There are no financial or operational agreements between the organizations, but we will work with Call2Recycle if significant issues arise from this overlap.

In addition, from time-to-time small quantities of material from other programs are inadvertently mixed with EPRA material and sent to our processors. Generally, this material is processed by EPRA as part of our material stream since it is too costly to attempt to sort and return these small quantities to the other programs.

Several private companies and other EPR programs may have plans filed with the province that may include products covered under this EPR program.

Finally, as part of the amalgamation with CESA, EPRA has assumed contracts with OPEIC and Lighting program (managed by Product Care). These contracts allow for EPRA to pick up and process material for those programs. The weight from that material is not counted in the EPRA program but instead is reported to those organizations who report on those volumes in their programs.

5. Stakeholder Consultation

Section 5(1)(b) of the Recycling Regulation provides:

The producer has undertaken satisfactory consultation with stakeholders prior to submitting the plan for approval and will provide opportunity for stakeholder input in the implementation and operation of the extended producer responsibility program.

During 2021, EPRA undertook a consultation process that provided meaningful opportunities for public consultation and comment. An overview of that process is included in Appendix B below.

Stakeholder input on the program is welcome at any time and is considered in program development. Input and feedback can be sent to: infoBC@recycleMYelectronics.ca

6. Collection System and Consumer Accessibility

Section 5(1) of the Recycling Regulation provides:

- (a) the plan will achieve, or is capable of achieving within a reasonable time,
 - (i) a 75% recovery rate or another recovery rate established by the director,
 - (A) for each subcategory listed in section 4 of Schedule 1 for the beverage container product category, and
 - (B) for each product category covered by the plan, other than the beverage container product category, if required by the director.
 - (ii) any performance requirements or targets established by the director.
 - (iii) any performance requirements or targets in the plan.
- (c) the plan adequately provides for:
 - (i) the producer collecting and paying the costs of collecting and managing products within the product category covered by the plan, whether the products are currently or previously sold, offered for sale or distributed in British Columbia.
 - (iii) reasonable and free consumer access to collection facilities.
 - (v) assessing the performance of the producer's extended producer responsibility program.

Since commencing operation in August of 2007, the Program has established a comprehensive network of collection locations where the public can conveniently drop off their electronics for responsible recycling. There is no cost to the public for drop-off of program material. This network currently consists of a group of Return-It™ Depots operated by Encorp Pacific, local government locations, not-for profit organizations and other locations.

In 2020 EPRA BC's network expanded to 291 collection sites providing convenient access throughout the province. This includes approximately 65 Return to Retail (R2R) locations across the province which further enhances consumer convenience. The number of collection sites has grown significantly since the time of filing of the last Program Plan particularly in non-urban locations.

Finding a drop-off location is easy for the consumer. They can simply enter their location or postal code on our website below:

<http://recycleMYelectronics.ca/bc/what-can-i-do/drop-off-centres/>

EPRA will continue to provide this convenient service to consumers of British Columbia.

Recognizing that it is not possible to have depot coverage in all of the remote and rural areas of the province, EPRA has developed criteria to ensure reasonable access as outlined in the Recycling Regulations. This criterion started with a premise of serving more than 97% of the provinces population and the current criteria accomplishes that target. Reporting on this criterion is done by a professional firm specializing in geographic information system (GIS) mapping and reporting.

The criteria are built around the concept of urban and non-urban areas. For urban coverage (defined as Census Metropolitan Area (CMA) by Statistics Canada) the Program has adopted a 30-minute drive time. For non-urban coverage, the Program has adopted a 45-minute drive time. Collection sites used in this calculation will be shown on the depot locator on the EPRA website or reported in the Collection Event list reported annually to the province.

EPRA periodically reviews the coverage to ensure that the criteria commitments are met.

The criteria outlined above are seen as minimum requirements and the Program is also willing to pursue other options in rural or remote communities where reasonable to enhance consumer convenience. Service into smaller non-urban communities usually involves participation from those communities in the collection of material. Wherever possible, the Program works to coordinate these collection events with other EPR agencies.

EPRA has several options available that provide convenient alternatives for commercial generators like businesses, office buildings and others who generate large volumes of program material. In most instances this product is picked up directly from the location and integrated into our normal recycling stream.

These options are described in more detail on our website at:

www.return-it.ca/electronics/industry/b2b-options/

Once collected, the material is consolidated and shipped to approved processors for recycling.

Some of the products obligated under the EPRA Program have commercial value after their first use and these products often follow paths other than EPRA's end-of-life recycling. Products that are leased are often returned to the lessor who may refurbish these products and sell them outside of BC. There is also a robust aftermarket for used electronics. This is done outside of the program and can involve electronics being collected and transported outside of the province.

Diversion of regulated devices from landfill is an important focus of EPR programs. To that end, waste audits are a valuable measure of a Program's success. In conjunction with other EPR agencies, EPRA has participated in a number of waste audits conducted by communities of various sizes throughout the province. These audits have demonstrated that EPRA's efforts have been successful in diverting our products from landfill. EPRA will continue its involvement in these shared programs to participate in waste audits undertaken by regional districts/municipalities and use the results to help guide improvements in the Program's performance.

EPRA uses alternatives to a recovery rate to track performance. Our products are durable goods with lifespans measured in years or decades. This coupled with the rapid changes in technology make recovery rates an impractical measure since the weights of similar products can change significantly over time. An additional factor is that sales data is reported in units and collection is tracked by weight. Because of this a recovery rate calculation would be a rough estimate based on average weights of products which could vary greatly over the years between sale and end-of-life. Finally, some products are in a broken state when returned which renders them impossible to identify. All of this combines to make the conversion between units and weight inaccurate resulting in recovery rate not being generally viewed as a reliable program measure for electronics.

7. Consumer Awareness

Annually EPRA will develop and roll out a communications plan with the following areas of focus:

- Create awareness of the EPRA Program, in particular about the electronic products that are accepted and where to take them for responsible recycling.
 - This will include working to improve awareness of products identified as having lower than average consumer awareness.
 - Making consumers aware that batteries included in products accepted under the Program should be left in the product when dropped off for safe recycling.
- Create awareness of environmental and data security risks associated with electronics not being properly managed.
- Ensure that the electronic products brand owners and retailers of regulated products are aware of their obligations related to the EPRA Program in BC. Invite participation in the Program in order for producers to easily and responsibly comply with the regulation.
- Ensure EPRA drop-off centers continue to be well informed regarding electronic products included in the Program and provide accurate information to customers.

To accomplish this, a variety of communication materials are deployed to facilitate education and awareness of the EPRA BC Program.

- EPRA provides signage to the network of drop-off locations.

- Promotional material is made available for electronic product retailers to order and display. Examples of these can be found at:

<https://recyclemyelectronics.ca/ordering>

- Media campaigns are utilized to convey information about the Program. Examples of the primary components of the campaign are radio, print and online advertisements. Research is conducted periodically to confirm that campaign messages resonate with residents to motivate them to e-recycle. In our most recent campaign, the vast majority of respondents felt that responsible recycling of electronics was important in helping to pay it forward environmentally. The current EPRA brand campaign centers around the theme “The future is in your hands. Don’t let it go to waste.” It uses images of nature and a person holding an electronic device to demonstrate literally and figuratively that the future is in their hands. The pay it forward message is to help empower and motivate consumers to do the right thing for the environment by recycling their EOLE through EPRA British Columbia collection locations. On the advertisements there is a link to the website URL so that residents can find out what and where to recycle.
- Since 2012 EPRA has conducted regular, extensive, consumer research to determine attitudes, motivators and habits. This research is used to enhance consumer awareness programs. This public opinion polling will be conducted at least every other year to determine awareness of electronics recycling in the province. This information will be outlined in EPRA’s Annual Report. This polling is conducted by an independent third-party organization experienced in these types of surveys and participants will provide a representative sample of population and region within the province.
- In addition to consumer awareness levels, consumer research can provide additional insights on whether awareness is higher for certain product categories. The information provided through this measure helps identify opportunities for targeted campaigns to address lack of awareness for specific product categories. The Program will continue to conduct surveys that measure awareness of product categories in addition to the Program’s overall consumer awareness level. Using the results from these surveys EPRA will:
 - Identify opportunities to raise awareness in product categories with lower-than-average awareness.
 - Develop awareness campaigns and strategies to target these product categories.
- The EPRA British Columbia website is continually updated to reflect any changes to the program. It will continue to clearly outline all of the materials acceptable for recycling as well as offer a prominently displayed collection depot locator with all of the locations in the province.
- EPRA will continue to offer an online learning hub, geared to young Canadians and educators. The learning hub is promoted through the EPRA and Recycle My Electronics websites as well as at special collection events. Access here: <https://recyclemyelectronics.ca/bc/articles/education>

- EPRA provides free-of-charge videos on recycling that are available for viewing and downloading on the EPRA and Recycle My Electronics websites. Examples include: *This is EPRA*, a video that provides a clear explanation and illustration of EPRA’s program, process and promise. <https://recyclemyelectronics.ca/bc/articles/videos/this-is-epra>
- The second video titled, *What is the EHF?* explains the environmental handling fee (EHF) in Canada. This video was developed to help consumers learn about the EHF and to assist retail organizations in training their staff on how to answer questions from consumers about the EHF. It can be viewed at: <http://www.recycleMYelectronics.ca/bc/stewards/what-is-the-ehf-a-training-video/>
- EPRA maintains and promotes open communication with its producers and stakeholders through a variety of services. EPRA offers a well-serviced, program specific and bilingual Steward Services call-centre. The toll-free helpline service accommodates inquiries from British Columbia residents and other stakeholders and will continue to be an important communication tool. All calls and email are answered by EPRA call center staff who are trained to answer British Columbia specific calls.
- EPRA is also currently working with other EPR organization members to support the RCBC hotline and the BCrecycles.ca website. These tools provide a single source for the public to get information about a wide range of items that can be recycled under the province’s various EPR programs.

EPRA is committed to maintaining strong consumer awareness with a goal of 80% of the BC population being aware of a place to recycle unwanted electronics in an environmentally friendly way. This is a notable level of awareness considering most commercial brands fall into the 40% to 70% awareness range with only iconic brands having recognition significantly higher than 70%.

Communications and Public Awareness: EPRA Extended Education



The collage displays various EPRA communication and public awareness materials:

- 2019 EPRA Annual Report:** A cover image featuring a scenic landscape with trees and water.
- This is EPRA video:** A video thumbnail showing a green recycling truck with the text "Divert from Landfill".
- What is the EHF? training video:** A video thumbnail showing a person at a service counter.
- The Recycle My Electronics Treasure Hunt:** A poster with the text "There's treasure buried in your home just waiting to be discovered! Let's find it together." and a map of British Columbia.
- PSA Storyboard:** A grid of small images illustrating a public service announcement.
- Quick Quiz: The Elements Inside Challenge:** A webpage snippet showing a person using a smartphone.
- EPRA Public Service Announcement:** A graphic with the text "The key to a safer future. Don't let it go to waste." and the EPRA logo.

8. Management of program costs

Section 5(1) of the Recycling Regulation provides:

- *(c) the plan adequately provides for:
 - (i) the producer collecting and paying the costs of collecting and managing products within the product category covered by the plan, whether the products are currently or previously sold, offered for sale or distributed in British Columbia.*
 - (v) the management of costs incurred by the program.*
 - (v) assessing the performance of the producer's extended producer responsibility program**

The Program has developed a cost-effective system to recycle obligated end-of-life electronic products in accordance with the requirements of the Electronics Recycling Standard (ERS). The ERS is updated from time to time as industry standards evolve. EPRA uses the most current version of ERS. In addition, all EPRA recyclers are required to hold internationally recognized standards of certification. Obligated program material may be brought in for recycling at no charge to our collection locations across the province. EPRA management regularly reviews the program and shares best practices from across all of our provincial programs to ensure that the program delivers a high quality service at the lowest practical cost.

The Program is funded by an Environmental Handling Fee (EHF) that is levied on new product sales of obligated products. This fee is remitted to the Program on the distribution and sale of new products in the province. The EHF, which is paid once in the supply chain, is not a tax or a refundable deposit. The EHF's are set at a level which covers the costs of administration, collection, transportation and responsible recycling of obligated products covered by the program including historic and orphan waste.

The EHF for each product obligated by the regulation is intended to reflect the true cost of managing that product. EHF's are reviewed at least once per year or as business conditions warrant. Examples of circumstances warranting a potential EHF change may include but are not limited to a change in products obligated, change in economic conditions or material change in the products themselves.

The program's financial statements are audited by an independent third-party auditor and in accordance with the Canadian accounting standards for not-for-profit organizations. Audits are done annually and published on EPRA's website, as part of its Annual Report. The Annual Report includes key financial information like revenues and expenditures along with additional performance measures such as cost per tonne and other non-financial measures including the number of collection locations and tonnes collected. This non-financial information is also audited to provide compliance with the current requirements for the Annual Director's Report to the Province.

The Program provides an efficient, effective deployment of the fees that are collected, ensuring that service providers are reimbursed in a fashion that meets the requirements in the regulation.

EPRA pays for the collection, transportation and recycling of the products collected in the Program. These services are provided through contracts with various suppliers. Transportation, consolidation and recycling services are typically awarded via a competitive bid process while collection services are compensated on a per tonne rate that is reviewed on a regular basis.

In its April 24, 2018 “Producer Paying the Cost of Managing Obligated Materials and Dispute Resolution” guidance document, the MOECCS outlined a requirement to describe the methodology used to justify the compensation offered for collection. To fulfill this requirement EPRA contracted BDO Consulting (BDO) to review depot compensation. BDO’s work validated EPRA’s methodology and the model used for determining compensation. They also confirmed that EPRA meets the requirement of paying the costs of collecting and managing products within the product category covered by the plan.

Factors considered in the EPRA cost model include:

- Changes in the product features that impact handling, including size, weight and material composition.
- Labour rates
- Facility requirements for collection and storage of product
- Overhead costs associated with program material.

The model will continue to be used to verify that EPRA continues to pay the cost of collecting and transporting material from EPRA’s collection network. Collection rate reviews generally run concurrent with our contract period; however off-cycle reviews occur when merited based on substantial movement in the factors listed above.

9. Management of Environmental Impacts

Section 5(1) and Section 5(3) of the Recycling Regulation provides:

- *5(1)(c) the plan adequately provides for:*
 - (v) the management of environmental impacts of the program.*
 - (v) assessing the performance of the producer's extended producer responsibility program.*
 - (vii) eliminating or reducing the environmental impacts of a product throughout the product's life cycle.*
 - (viii) the management of the product in adherence to the order of preference in the pollution prevention hierarchy*
- *5(3) For the purposes of subsection (1) (c) (viii), the pollution prevention hierarchy is as follows in descending order of preference, such that pollution prevention is not undertaken at one level unless or until all feasible opportunities for pollution prevention at a higher level have been taken:*
 - (a) reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency;*
 - (b) redesign the product to improve reusability or recyclability;*
 - (c) eliminate or reduce the generation of unused portions of a product that is consumable;*
 - (d) reuse the product;*
 - (e) recycle the product;*
 - (f) recover material or energy from the product;*
 - (a) otherwise dispose of the waste from the product in compliance with the Act.*

Reduce

EPRA will publish a bi-annual report which focuses on broad sustainability trends impacting industry-led product stewardship programs in Canada, North America and globally. These reports will highlight the electronics industry’s progress related to designing environmentally conscious products, explaining market

trends impacting the recovery of these devices, along with the many technological advances that are creating change in electronics design. These reports will be found at: <https://epra.ca/GES>

Reuse

Reusing electronic products is promoted through the communications and public awareness program where markets and opportunities for reuse in-province exist. Many of our producers have programs for recovering useable electronics for refurbishment and resale. This could include product leased to businesses and recovered and reused at the end of the lease. In addition, there are a number of market options available for consumers to resell (or gift) used electronics. Finally, there are commercial and non-profit organizations which recover and resell used electronics.

Recycle

Responsible recycling and processing of end-of-life electronics is the hallmark of EPRA BC's program. As outlined above, EPRA encourages reuse of working electronics prior to reaching end of life. 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. Both primary and downstream recyclers are audited and approved in accordance with the Electronics Recycling Standard (ERS) to ensure that materials are handled in a safe, secure and environmentally sound manner.

To ensure that all materials collected under the program are responsibly recycled, EPRA contractually requires all recyclers to meet and maintain 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 about the Recycler Qualification Process can be obtained at www.rqp.ca

EPRA collects a wide array of different products but the current recycling methods result in materials that fit mostly into the major categories outlined below:

Material	Process
Leaded Glass	Smelted to reclaim lead
Aluminum	Smelted for reclaim
Circuit Boards	Smelted to reclaim metals
Copper	Smelted for reclaim
Ferrous Steel	Smelted for reclaim
Plastics	Pelletized for reuse
Wire and Cables	Smelted for reclaim
Batteries	Mechanically or thermally separated for metal recovery

For clarity, below is a breakdown in accordance with:

Part 2 – 5 (3): For the purposes of subsection (1) (c) (viii), the pollution prevention hierarchy is as follows in descending order of preference, such that pollution prevention is not undertaken at one level unless or until all feasible opportunities for pollution prevention at a higher level have been taken:

PPH Elements	EPRA's Metric
(a) <i>reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency;</i>	<ul style="list-style-type: none"> • <i>Regular reporting & EPRA encouragement? on industry improvements in this area (see above under “reduce”)</i>
(b) <i>redesign the product to improve reusability or recyclability;</i>	<ul style="list-style-type: none"> • <i>Not feasible - little to no manufacturing or R&D related to electronic devices in Canada Currently about 4% of manufacturing takes place in the US with the vast majority in Asia (China, Taiwan, S. Korea, Vietnam, etc.) Canadian offices of these producers have little or no influence in the design of electronics as Canada represents about 1% of the world market</i>
(c) <i>eliminate or reduce the generation of unused portions of a product that is consumable;</i>	<ul style="list-style-type: none"> • <i>Not feasible – the only consumable for electronic devices is ink/toner cartridges which are not obligated other than those returned in obligated products. These are managed by the program</i>
(d) <i>reuse the product;</i>	<ul style="list-style-type: none"> • <i>Promoted by program, work with not-for-profit entities in this space (see above under “reuse”)</i>
(e) <i>recycle the product;</i>	<ul style="list-style-type: none"> • <i>Responsible, audited recycling to a global standard (see above under “recycle”)</i>
(f) <i>recover material or energy from the product;</i>	<ul style="list-style-type: none"> • <i>Limited to problematic materials such as certain plastics, wood, ink/toner cartridges, etc.</i>
(g) <i>otherwise dispose of the waste from the product in compliance with the Act.</i>	<ul style="list-style-type: none"> • <i>Limited to materials with no recycling options, such as carpeting or foam off speakers, shredder fluff and floor sweepings</i>

EPRA will continue to manage collected products in this fashion whenever feasible and economically viable, recognizing that the management of commodities is subject to change.

EPRA commits to report annually on product end-fates of each of the material components managed under the plan.

10. Dispute Resolution

Section 5(1) of the Recycling Regulation provides:

- *(c) the plan adequately provides for (vi) a dispute resolution procedure for disputes that arise between a producer and person providing services related to the collection and management of the product during implementation of the plan or operation of the extended producer responsibility program.*

The Program has incorporated normal commercial dispute resolution provisions into contracts with third parties. EPRA encourages a timely, staged approach to resolving issues and addresses disputes with service providers first through a local internal review process which encourages a quick fair resolution. If unresolved at the local level, senior management will become involved in an attempt to facilitate resolution. Should these steps leave unresolved disputes they would be addressed using standard commercial legal procedures.

11. Performance Monitoring and Reporting Commitments

Section 5(1) of the Recycling Regulation provides:

- *(a) the plan will achieve, or is capable of achieving within a reasonable time:

 - (ii) any performance requirements or targets established by the director.*
 - (iii) any performance requirements or targets in the plan.**
- *(c) the plan adequately provides for (v) assessing the performance of the producer's extended producer responsibility program.*

EPRA has committed to reporting on a core set of measurements including operational, accessibility and awareness metrics. Reporting commitments are outlined in the table below:

Metrics	Performance Targets and Reporting Commitments
Governance	Significant changes to the agency's structure or governance
Products sold and collected	
Amount of product sold (units)	Annually
Amount of product collected (weight)	Annually *3 rd party non-financial assurance
Amount of product collected by regional district	Annually
Amount of product collected per capita by regional district and total for the province	Annually

Collection System and Accessibility	
Location and number of contracted collection sites, and changes in location and number from previous report	Annually *3 rd party non-financial assurance
Number of contracted sites by RD	Annually
Number and location of contracted collection events by RD	Annually
Percent of population with access to a collection location	98% target Every other year. Report standard and methodology used
Waste Audits	
The results of local government waste composition studies identified in kilogram (kg) per capita of program material and the total amount batteries from each of the studies	Annually as can be coordinated with other EPR agencies
Consumer Awareness	
Percentage of population aware of where to take electronics for recycling	80% target Reported Annually (biennial survey) Methodology used, including survey question
Management of Program Costs	
Program costs per tonne of material collected	Annually
Financial statements	Annually 3 rd party audited
Management of Environmental Impacts	
Efforts to reduce environmental impacts throughout the product life cycle	Annually through link to Design for Environment (DfE) report
Management of collected products to final disposition.	Report by Material type, Percentage of total tonnage, Processing methods, Level of pollution prevention hierarchy Annually *3 rd party non-financial assurance

*3rd non-financial assurance commitments are subject to the ministry requirements and guidance.

APPENDIX A

The following product categories are covered in whole or part by the EPRA program:

Schedule 3

[en. B.C. Reg. 23/2006, s. 8; am. B.C. Regs. 374/2008, ss. 2 to 6; 296/2009, s. 7; 132/2011, App. ss. 1 to 3; 297/2009, Sch. ss. 1 and 2.]

Electronic and Electrical Product Category

Definitions

1 In this Schedule:

"computer" includes a computer monitor and computer peripheral;

"computer peripheral" means a keyboard, mouse or cable that attaches or is attached to a computer;

"desktop printer" means a printer that will print on paper not exceeding 8.5 inches in width but does not include a label printer.

Electronic and electrical product category

2 (1) The electronic and electrical product category consists of the following products:

(a) electronic or electrical information technology or telecommunication devices or equipment including, without limitation,

(i) computers, whether desktop, laptop, portable or part of other products, printers, computer peripherals and parts of computer systems,

(ii) copying equipment,

(iii) typewriters,

(iv) calculators,

(v) fax machines, telex machines and telephones and telephone answering systems, and

(vi) other devices, equipment or media for collecting, storing, processing, presenting or communicating information, including, without limitation, sounds and images;

(b) electronic or electrical audio visual and consumer equipment or media, including, without limitation, televisions, radio sets, cameras, video recorders and projectors, audio players, recorders, headphones, microphones, amplifiers, equalizers, speakers, musical instruments, and any other products or equipment for recording or reproducing sound or images, including

equipment or media for distributing sound and images other than telecommunication equipment described in paragraph (a);

(c) electronic or electrical appliances including, without limitation,

- (i) floor or carpet care appliances,
- (ii) garment care appliances including, without limitation, irons and mangles,
- (iii) appliances for counter top cooking, including, without limitation, toasters, toaster ovens, fryers, hot plates, microwave ovens, coffee makers, coffee grinders, kettles, blenders, mixers and food processors,
- (iv) knives,
- (v) devices for opening or sealing containers or packages,
- (vi) devices for measuring time,
- (vii) personal care appliances, including, without limitation, hair cutting and drying appliances, tooth care appliances, shavers and massagers,
- (viii) scales,
- (ix) portable air treatment appliances, including, without limitation, fans, air purifiers, humidifiers and air conditioners,
- (xvii) water purifiers, and
- (xviii) trash compactors and food waste disposal appliances;

(d) electronic or electrical tools, other than large-scale stationary industrial tools, including, without limitation,

- (i) drills, saws and welding and soldering tools,
- (ii) equipment for turning, milling, sanding, grinding, sawing, cutting, shearing, drilling, punching, folding, bending or otherwise processing wood, metal or other materials,
- (iii) tools for riveting, nailing or screwing or removing rivets, nails or screws,
- (iv) sewing machines, knitting machines and other appliances for weaving or processing textiles,
- (v) snow blowers and mowers and other gardening tools,
- (vi) slot machines,
- (vii) bar code and point-of-sale scanners;

(f) electronic or electrical toys, including, without limitation, trains, car racing sets, cars and trucks, including remote control and ride on toys, video games and video gaming equipment and consoles;

(g) electronic or electrical biking, diving, running and rowing machines or computers and other sports equipment with electronic or electrical components;

(h) electronic or electrical devices for arts, hobbies or crafts;

(i) electronic or electrical monitoring and control instruments, including, without limitation, smoke detectors, alarm systems, heating regulators, thermostats and appliances for measuring, weighing or adjusting;

(j) electronic or electrical appliances that automatically dispense money or products on demand;

(k) electronic or electrical medical devices or equipment for detecting, preventing, monitoring, treating or alleviating illness, injury or disability, other than a medical device that has been implanted in a person or that has been exposed to infectious matter;

(l) accessories for use with any products referred to in Schedule 3, including cables, adapters, connection cords and chargers;

(m) batteries that could be used in an electronic or electrical product listed in this section, including primary batteries and rechargeable batteries.

For Item 2 (1)(m) EPRA only collects batteries that are embedded in the devices we collect under our program. Batteries embed or sold with the devices in our program are considered to be components of the device.

For Item 2 (1)(a) The electronic and electrical product category does not include computers and televisions that are part of or attached to vehicles, marine vessels or commercial or industrial equipment.

Notes:

1. The Program does not include items weighing in excess of 200 kgs.
2. The Program does not include any medical device that has been implanted in a person or that has been exposed to infectious matter.
3. The Program does not include fixed installation electrical and/or mechanical devices. (i.e. a device that is wired directly into the structure, requires professional installation and/or cannot be readily removed without altering the electrical connections.
4. The list of Product Definitions and Clarifications may be revised periodically by the Program.
5. While adhering to program principles, additional or expanded descriptions of eligible products and adjustment of program product categories may be necessary as technology changes.

Appendix B: Stakeholder Consultations

Part I: Overview:

As required under Section 5(1)(b) of the Recycling Regulation, in 2021 EPRA undertook a consultation process that provided meaningful opportunities for public consultation and comment. Key aspects of the consultation included:

- In July of 2021 posting the new draft Plan on the EPRA British Columbia website: <https://recyclemyelectronics.ca/bc/regulations-and-approved-plan> Along with the Plan and an invitation for comments, we posted a reference to the Depot Compensation consultation done in 2019.
- Informing via email, the regional districts, industry stewards, BC Product Stewardship Council, UBCM, Local Advisory Committee and the Ministry of Environment of the public consultation notice and method for feedback. In addition, notices were posted in the RCBC and CWMA newsletters.
- Due to covid restrictions, public consultations were held via webinar on August 17 & 25, 2021 for interested parties. Consultation comments were accepted until September 30, 2021.

Part II: Sessions and Attendees:

1. Public Consultation #1: via Webinar (on-line) – August 17, 2021. Registered – 23

Attended 12:

- Major Appliance Recycling Roundup (MARR) (2)
- Capitol Regional District
- Call2Recycle
- Regional District Fraser Fort George (2)
- Retail Council of Canada
- Encorp Pacific
- Product Care Association
- Ministry of the Environment
- RD Metro Vancouver
- City of Abbotsford

2. Public Consultation #2: via Webinar (on-line) – August 25, 2021. Registered – 22

Attended - 13:

- Health Stewardship Association
- Columbia Shuswap Regional District
- Product Care (3)
- Thompson Nicola Regional District
- Alberta Municipalities
- Regional District Kitimat Stikine
- Ministry of Environment
- Retail Council
- BC Product Stewardship Council
- Sonnevera
- Tire Stewardship BC

Part III: Written Submissions Received:

- Regional District of Squamish (September 30, 2021)
- Metro Vancouver (September 29, 2021)
- Regional District Fraser-Fort George (September 29, 2021)
- Zero Waste BC (September 28, 2021)

Part IV: Questions and EPRA Responses:

Consultations were open sessions and, in addition, written questions and comments were invited. EPRA only received submissions from 4 stakeholders however three of those stakeholders provided very extensive written comments. Like comments have been aggregated in the summary below for ease of review.

Accessibility:	
3 stakeholders raised questions related to how EPRA is addressing accessibility for consumers	
<i>Question/Comment</i>	<i>EPRA Response</i>
<i>In general, most of these questions involved the ‘standard’ regarding drive time, population served, etc.</i>	The ‘standard’ with drive time etc. is used so that we have a standardized measurement system to track accessibility. EPRA also, with rare exceptions, picks up in communities of any size if there is a suitable location to collect material.
<i>One stakeholder asked if those BC residents located in rural or remote locations are “subsidizing” the collection of electronics in the Province’s urban settings.</i>	The collection site funding is not designed to have any group, rural or urban, subsidize any other group. The majority of costs are borne by the urban locations due to volume, as would be expected
Awareness:	
3 stakeholders provided comments on the plan in the area of program awareness	
<i>Question/Comment</i>	<i>EPRA Response</i>
<i>What is the potential for consumer confusion on recycling like electronic devices with the multiple regulated programs?</i>	While there is some potential for confusion between various electronic/electrical programs, EPRA works with the other stewardship agencies to minimize this. Familiarity with the program is facilitated through materials provided both to the collection networks for posting as well as educational material on the EPRA and Return IT websites.
<i>What should the target related to consumer awareness of electronics recycling programs be in the province?</i>	One submission suggested that the awareness target should be 100% which, while ideal is unfortunately not realistic. EPRA believes that the target set out in our draft plan is a progressive one. EPRA’s awareness numbers put the EPRA program among top performing EPR programs in the province.
<i>What messages should the program be communicating to consumers?</i>	EPRA focuses on creating awareness in 3 areas: 1. Communicating which products are accepted into the program 2. Encouraging consumers to take the products for safe, secure recycling 3. Education on what happens to collected electronics. The EPRA program also educates on data security risks associated with electronics that are improperly managed.

Performance Measurement:		
2 stakeholders commented the program's performance measurement indicators and three stakeholders asked about the use of waste audits to measure diversion of regulated electronics from landfills		
<i>Question/Comment</i>	<i>EPRA Response</i>	
<i>What alternative measures can track the program's impacts?</i>	The EPRA suite of performance measures that are currently in place represent a broad range of factors to assess overall success. The program reports annually on a range of measures including awareness, accessibility, tonnage collected, the number of collection sites and waste audits. EPRA routinely participates in and monitors its international network for program improvement opportunities.	
<i>What approach is EPRA employing to participate in waste audits across the province? What is the criteria used for determining where waste audits are undertaken in BC?</i>	As has been underway for several years, EPRA works in association with other EPR programs in the province to participate in regional district and municipal waste audits. The audit sites are selected specifically to represent a cross section of both urban and rural sites, and the regional diversity of the province.	
<i>Light-weighting of newer products would mean older, end-of-life products would carry a higher weight per product, thus potentially increasing the recovery rate. As a result, it is clear that use of a recovery rate for electronics may not be desirable as a performance measure, but it does not appear to be impractical due to light-weighting.</i>	This section of the program plan has been reworded for clarity. The changing weights of products over long periods of time are only one element that make recovery rates a difficult measure to reliably compute. Other variables in addition to changing weights, including the vast range of the life of electronics, and the rapidly changing types of products in the electronic industry, results in recovery rate not being generally viewed as a reliable program measure.	
Processing:		
1 Stakeholder was seeking information from the program on how the processing of selected materials are handled in a responsible manner		
<i>Question/Comment</i>	<i>EPRA Response</i>	
<i>What portion of plastics found in electronic devices is recycled as opposed to other means of processing?</i>	Fortunately, the plastics in electronic devices is a high grade that can be reused in the manufacture of new product, so that majority is processed and sent to downstreams for reuse. More than 93% of electronics can be processed and the materials recycled in some manner.	
Other Questions Raised:		
<i>Question/Comment</i>	<i>EPRA Response</i>	
<i>The RDFFG would like a permanent collection facility located in McBride, British Columbia. There is no collection facility located within the 45 minute drive radius, EPRA products are sold in the community, and McBride is</i>	In our webinar presentations, McBride was specifically highlighted as one of 2 locations that EPRA would like to have a permanent collection site. McBride is a smaller community with few collection options and to date it has not been possible for the program to find a collection site. EPRA remains interested in this opportunity and does offer, as an alternative, collection events which have been held on an annual basis for the last few years.	

<i>located on a major highway which would facilitate ease in collection</i>		
<i>Some products are sold on the aftermarket outside of British Columbia. How does EPRA account for these products when they reach end of life, what happens to the products environmental handling?</i>	The EPRA program does not track but does encourage reuse and refurbishment by the public to make the most of a product before it reaches end of life recycling. EPRA’s visibility to product begins when the product at end of life is dropped off for final processing.	
<i>Along with being complimentary of EPRA’s use of a Local Advisory Committee (LAC), one stakeholder asked about who was on the committee and how the committee’s recommendations were handled.</i>	Since inception, the EPRA local advisory committee has had broad representation from the stakeholder community. Local and regional government (large and small), not-for-profits, reuse organizations, retail representatives are examples of participants on the committee. The committee’s recommendations are welcomed by senior management and implemented where feasible.	
<i>A question was tabled in relation to EPRA’s involvement with the Industrial Materials Exchange (IMEX).</i>	Since the original draft of the Plan was done, EPRA has learned that RCBC has discontinued the IMEX program for electronics. Reference to IMEX will be removed from the EPRA program plan.	
<i>EPRA should include the description of the procedures for dispute resolution in the Plan, as the Guide requires</i>	The dispute resolution procedures are outlined in the program plan.	
<i>The program could pursue disposal bans with local governments as a way to ensure consumers do the right thing but also that they are aware that throwing these products away is not appropriate</i>	EPRA does encourage disposal bans for electronics and conveys that to the local governments as they review their policies. EPRA also provides educational materials to support community awareness on the importance of recycling electronics.	
<i>It should be made clear what happens when other stewardship items, such as CESA products, are accidentally deposited at an EPRA collection site. Are they counted and recycled, or are they given to the CESA program?</i>	Should non-EPRA material be accidentally received in the EPRA collection of end of life electronics, the program has procedures in place to have it reported and handled safely and in accordance with the governing regulation.	
<i>Will EPRA consider working with other electronic EPR programs to conduct unaccounted product studies, estimates of electronics reuse, or additional waste composition studies to determine where program materials are ending up?</i>	EPRA is pleased to be already active with other participants in waste audits conducted at landfills and this proves to be most insightful into the effectiveness of the awareness, accessibility and collection of end of life electronics.	

<i>Can the term e-recycle be defined within the Plan? How is it distinct from 'recycling'? How is "e-recycling" distinct from "recycling"?</i>	E-recycling and recycling within the Plan both refer to electronics recycling. For consistency and to avoid confusion, e-recycling has been removed and replaced with 'recycling'	
<i>Is EPRA considering future research to address costs included within product pathways that are not directly managed by the stewardship program (i.e. Disposal at landfill?)</i>	EPRA is not equipped to fund research or product management of waste product that is not within the program mandate.	
<i>Is this Plan intended to be an 'evergreen' plan like the recent TSBC Plan?</i>	This EPRA plan is being presented to the Ministry as a new plan (as opposed to a renewal of the previous plan) however it is not a part of the pilot 'evergreen' plan program like the TSBC Plan	
<i>Should EPRA review all collected devices for reuse and/or refurbishment?</i>	EPRA encourages consumers to reuse before recycling so the vast majority of items received by EPRA are truly end-of-life. This approach has been effective across the country and as a point of reference, a 2016 study done by Alberta Recycling Management Authority (ARMA) found that only 0.2% of laptops and 0.5% of computers were suitable for reuse. As such, the cost would be excessive to try to sort this very small amounts of potentially reusable product from the millions of items received each year. EPRA does ensure that the majority of the material coming out of the recycling process is reused by downstreams in new products.	
<i>What role does the Electronics Reuse & Refurbishing Program (ERRP) play in the EPRA BC program?</i>	The ERRP was not a reuse program but rather a voluntary standard that EPRA had developed for certifying refurbishers in Canada to an acceptable standard. Reference to the ERRP has been removed in the Plan as the international certification standard, R2, is now the standard that guides reuse.	

Part V: Sample of Notice of Consultation:



RCBC RECAP

Dear Craig,

Welcome to the August's edition of RCBC's Recap, the monthly member newsletter where we keep you up to date on the latest news, events, and consultations across the world of recycling, waste reduction, and the circular economy!



Events & Consultations

Notice of Consultation: EPRA BC Program Plan

Electronic Products Recycling Association British Columbia (EPRA BC) will be holding two consultation sessions on the submission of their 5 year Program Plan. EPRA BC operates as part of the Electronic Products Recycling Association (EPRA) and is responsible for managing the end-of-life recycling program on behalf of manufacturers, retailers and distributors of electronics in BC and pursuant to the BC Recycling Regulation.

On November 6, 2018, the Ministry of Environment approved the Product Stewardship Plan submitted by EPRA BC and that Program Plan is set to expire on December 18, 2021. You can view the new draft 5 year Program Plan along with the results of the Depot Compensation consultation that was submitted to the MoE on October 1, 2019.

EPRA is inviting you to register for one of the consultation sessions listed below on the new Program Plan. The consultation sessions will be webinars and the registration links are provided below:

- **Webinar 1:** Tuesday Aug 17th, 2021 10:00 AM - 11:00 AM PDT
- Registration Link: <https://attendee.gotowebinar.com/register/3881816322721420300>
- **Webinar 2:** Wednesday Aug 25th, 2021 10:00 AM – 11:00 AM PDT
- Registration Link: <https://attendee.gotowebinar.com/register/9223339467968937740>

After registering, participants will get a confirmation email containing information about joining the webinar.

INFORMATION UPDATE

Dear Craig,

Please find attached 34 items for your interest:

News

- ▶ RDBN - [Grocery bag dilemma; behaviour versus composition \(pdf\)](#)
- ▶ CSRD - [Sicamous landfill to reopen after temporary closure due to wildfire \(pdf\)](#)
- ▶ RDNO - [Automated garbage collection coming soon in Vernon \(pdf\)](#)
- ▶ RDOS - [South Okanagan to reduce oil waste \(pdf\)](#)

- ▶ RDKB - [West Kootenay tech innovator hosts circular economy conference \(pdf\)](#)
- ▶ RDKB - [Greenwood auto shop opens oil recycling facility \(pdf\)](#)
- ▶ RDCK - [Young artists create mural on Nelson recycling building \(pdf\)](#)

- ▶ BC Wide - [British Columbia EPR program hits 85% recovery rate \(pdf\)](#)
- ▶ BC Wide - [Municipalities empowered to ban single-use plastics \(web only\)](#)
- > **Additional Information** on this announcement for CWMA Members, from [Avery Gottfried, Senior Policy Specialist, Clean Communities, Environmental Standards Branch](#)

- ▶ USA - [U.S. Plastics Pact hopes to make all plastic reusable or recyclable by 2025 \(pdf\)](#)
- ▶ Scotland - [Glenfiddich Is Now Using Whisky Waste To Power Its Trucks \(pdf\)](#)
- ▶ Global - [Press Release: Canadian Covered Composting Technology in Australia \(pdf\)](#)

Consultations

- ▶ **August 17 & 25, 2021 | Electronic Products Recycling Association British Columbia (EPRA BC)** will be holding consultation sessions on the submission of the 5-year Program Plan | [More Information](#)
- ▶ **July 30, 2021** deadline | BC Ministry of Environment and Climate Change Strategy has published

Notice of Consultation EPRA BC Program Plan

Electronic Products Recycling Association British Columbia (EPRA BC) will be holding two consultation sessions on the submission of our 5 year Program Plan

EPRA BC operates as part of the Electronic Products Recycling Association (EPRA) and is responsible for managing the end-of-life recycling program on behalf of manufacturers, retailers and distributors of electronics in BC and pursuant to the [BC Recycling Regulation](#).

On November 6, 2018, the Ministry of Environment approved the Product Stewardship Plan submitted by EPRA BC and that Program Plan is set to expire on December 18, 2021.

You can view our new draft 5 year Program Plan along with the results of the [Depot Compensation consultation](#) that we submitted to the MoE on October 1, 2019.

EPRA is inviting you to register for one of the consultation sessions listed below on our new Program Plan. The consultation sessions will be webinars and the registration links are provided below:

Webinar 1: Tuesday Aug 17th, 2021 10:00 AM - 11:00 AM PDT

- Registration Link: <https://attendee.gotowebinar.com/register/3881816322721420300>
- After registering, participants will get a confirmation email containing information about joining the webinar.

Webinar 2: Wednesday Aug 25th, 2021 10:00 AM - 11:00 AM PDT

- Registration Link: <https://attendee.gotowebinar.com/register/9223339467968937740>
- After registering, participants will get a confirmation email containing information about joining the webinar.

Written comments are also welcome. To provide written feedback on the EPRA BC Program Plan, please send your comments by September 30, 2021 to infoBC@epra.ca or by mail to:

EPRA BC