



End-of-Life Electronic Products Stewardship Program Plan - Prince Edward Island

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Submitted by: **Electronic Products Recycling Association**
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Contact: Maylia K. Parker
Executive Director, Atlantic Canada
Electronic Products Recycling Association | Atlantic Canada
238A Brownlow Avenue | Unit 102 | Dartmouth, Nova Scotia B3B 2B4
e: maylia.parker@epra.ca



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1.0 Introduction

Electronic Products Recycling Association (EPRA) is pleased to submit this update to the approved End-of-Life Electronics (EOL) Stewardship Program for Prince Edward Island. This plan meets the requirements of Section 24 of the *Materials Stewardship and Recycling Regulations* (the Regulations) under the auspices of the *Environmental Protection Act* by diverting EOL from disposal. Program proposal requirements are denoted in headings (i.e., Section 24 (3) (a) through (f)).

EPRA is incorporated to deliver regulated programs in nine of ten Canadian provinces. Members of Electronics Product Stewardship Canada (EPSC) and the Retail Council of Canada (RCC) established EPRA in 2011 as the national not-for-profit entity chartered with improving the efficiency and effectiveness of Canada's industry-led and regulated electronics stewardship programs.

Under this plan, regulated electronic products that are collected through the EPRA program in Prince Edward Island are diverted from landfill and prevented from illegal export, with resulting materials put back into the manufacturing supply chain. These benefits are emphasized in the communications and public awareness strategy that aims to maximize participation in this stewardship program.

1.1 Program Principles

EPRA provides a stewardship program in Prince Edward Island that:

- is consistent with industry's guiding principles for stewardship programs, which includes harmonization with other jurisdictions where and to the extent possible;
- open to all obligated stewards;
- provides a level playing field that ensures fair competition;
- achieves a high level of compliance and eliminates the potential for free-riders;
- addresses the issue of orphan, historic, and imported products from companies without a provincial (Prince Edward Island) or Canadian presence;
- ensures 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);
- prioritizes program delivery in an environmentally sound and economically efficient manner, and;
- includes public transparency for financial and environmental reporting.



2.0 Program Management Structure (Section 24 (3)(a))

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.

2.1 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 drop-off locations for the program in Prince Edward Island, associated with solid waste transfer stations and the provincial landfill;
- Establishing and maintaining the infrastructure for transportation and consolidation of materials collected from the drop-off locations; and
- Overall day-to-day management of the collection and transportation network on Prince Edward Island.

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

Whereas the Prince Edward Island 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.

2.2 EPRA Atlantic Local Advisory Committee

EPRA has established a Local Advisory Committee to foster the exchange of information on the program(s) and as a forum to discuss issues of local concern. This committee has representatives from Prince Edward Island, New Brunswick, Nova Scotia and Newfoundland and Labrador who are all familiar with the electronics recycling industry. Regulatory staff from the Atlantic Provinces are invited to attend as observers. The committee meets twice per year.

3.0 Program Details

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

3.1 Obligated Program Materials

An up-to-date listing of products addressed by this plan can be found at:

<https://recyclemyelectronics.ca/pei/what-can-i-recycle>



This is reflective of Section 20(e) of the Regulations, as updated from time to time, which defines electronic product.

3.2 Collection, Transportation and Consolidation (Section 24 (3)(b)(c))

3.2.1 Collection Network

EPRA management, working in concert with the Local Program Delivery Manager, collect program materials across the province. Residents and businesses have access to a network of drop-off locations that provide adequate, appropriate, free, and convenient drop-off service.

EPRA has established the following criteria for service:

- Sites are strategically located to serve PEI residents, considering factors such as population size and availability of waste management infrastructure.
- All drop-off locations are open a minimum of 30 hours per week, including four (4) hours on Saturday (except statutory or civic holidays), unless otherwise approved by EPRA.
- All drop-off locations have sufficient floor space to accommodate the safe and efficient handling and storage of program materials accepted from the general public and industrial, commercial, institutional (ICI) sector.
- Sites can accommodate scheduled deliveries of large quantities of program materials from the ICI sector.

A listing and map of the current EPRA drop-off locations is included in Appendix A. The up-to-date collection network is also available at: <https://recyclemyelectronics.ca/pei/where-can-i-recycle>

3.2.2 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 and steward feedback on both geographic/population coverage and customer service levels provided by EPRA drop-off 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 help identify any service gaps.

Data analysis will also assist in assessing the effectiveness of the existing collection



network. Detailed information on volumes collected is recorded by operations staff and is reviewed periodically by the EPRA Executive Director, Atlantic Canada.

3.2.3 Incidental Municipal Collection

All incidental municipal collection is handled by Island Waste Management Corporation (IWMC) and they are contracted as the EPRA Local Program Delivery Manager for Prince Edward Island.

3.2.4 Book My Pick Up

ICI sector generators of EOLE can arrange for program materials to be picked up directly from their location using EPRA's Book My Pick Up service.

3.2.5 Consolidation and Transportation

All program materials collected through the drop-off network, incidental municipal collection, or Book My Pick Up service are consolidated for transportation off Prince Edward Island to an EPRA-approved recycler.

3.3 Voluntary Return to Retail Program

EPRA offers a voluntary Return to Retail Incentive Program that is available to all stewards who are in good standing with the program. The Return to Retail program guidelines and application form are available at:

<https://recyclemyelectronics.ca/pei/return-to-retail>

EPRA makes retailers aware of the program's benefits.

3.4 Program Funding

3.4.1 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 allows consumers and the ICI sector to drop-off end-of-life electronic products to designated drop-off locations at no charge with the assurance that these items will be responsibly recycled. The ICI sector has the option of scheduling drop-offs or "Book My Pick Up" for large quantities of EOLE.

The EHF for each product designated by regulation will reflect the true cost of managing that product. The EHF provides sustainable funding for collection, handling, consolidation, transportation, recycling, communications, public awareness, compliance and administration expenses, and environmental audits.

To review current Environmental Handling Fees for obligated products in Prince Edward Island, visit: <https://recyclemyelectronics.ca/pei/product-definitions-and-ehf>



3.4.2 Setting the Environmental Handling Fee

Rather than a single flat fee set across all electronics products designated by the 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 program activities. The PEI program is audited annually by an independent external auditor.

3.4.3 EHF Reporting and Remittance

Obligated stewards registered under the EPRA plan remit EHF monthly to EPRA for their previous month's net sales (total sales less returns).

Due to complexities in the product supply chain and given that 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, province-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.

4.0 Options for End-of-Life and Unwanted Electronics

Reduce: EPRA publishes an annual report which focuses on broad sustainability trends impacting industry-led product stewardship programs in Canada, North America and globally. These reports highlight the electronics industry's progress related to designing environmentally conscious products and explaining market trends impacting the recovery of these devices, along with the many technological advances that are creating change in electronics design. These reports can be found at: <https://epra.ca/GES>

Reuse: Reusing unwanted electronic products is promoted through the communications and public awareness program as the first option where markets and opportunities for reuse in-province exist. For residents on Prince Edward Island considering this option, caution should be exercised and particularly with respect to protection of personal information. The EPRA website provides some guidance in this area. <https://recyclemyelectronics.ca/pei/how-to-prepare-your-device>.

EPRA has developed the Electronics Reuse and Refurbishment Program (ERRP) which is designed to foster responsible reuse and refurbishment of electronics. Under the ERRP, EPRA recognizes reuse entities who meet the strict criteria outlined in the program. This provides donors of electronics with a level of assurance that electronics donated for reuse to these organizations will be handled and distributed in a responsible manner. EPRA has worked closely with Computers for Schools Plus (CFS+) to help their affiliates across Canada to attain ERRP certification.



Obligated products that are used or refurbished will not attract an EHF.

Recycle/Recover: Responsible recycling and processing of end-of-life electronics is the hallmark of EPRA's PEI 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 is updated from time to time, to ensure they meet the ongoing needs of the programs. Additional information about the Recycler Qualification Process can be obtained at www.rqp.ca

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

5.0 Program Quality Control/Assurance (Section 24 (3)(e))

EPRA adopted and implemented standards, protocols, procedures, tracking and auditing mechanisms to maintain and confirm program integrity and regulatory compliance.

5.1 Collection Site Inspections

Drop-off sites operate under an agreement with EPRA and are inspected annually to ensure compliance with EPRA requirements.

5.2 Chain of Custody

A strict chain-of-custody is maintained from the collection site, through consolidation, to the recycler.

5.3 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 (ERS) in order to receive and process program materials. This process may be updated from time to time to ensure they meet the ongoing needs of the program. Additional information of the Recycler Qualification Process can be obtained at www.rqp.ca.

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.

5.4 Auditing of Obligated Stewards

Detailed audits of remitters (brand owners) are performed on a regular basis to ensure both compliance and completeness in the reporting of revenue. Audit selection is a function of, but not limited to, materiality, any non-standard or unusual behavior, random selection, and with the plan that all remitters are audited at some point within a five-year period.

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.

6.0 Communications and Awareness (Section 24 (3) (f))

EPRA/Recycle My Electronics is recognized as a national leader in stewardship and electronic waste (e-waste) diversion. EPRA/Recycle My Electronics' communications strategy promotes the program's promise of integrity, as an organization led by robust standards and strict auditing processes. Through EPRA/Recycle My Electronics, regulated electronic products are not only diverted from landfill and recycled but also prevented from being illegally exported. EPRA/Recycle My Electronics is responsible for safe, secure recycling of electronics.

Recycle My Electronics is EPRA's award-winning, consumer-facing brand. Recycle My Electronics promotes the importance of recycling EOLE, as well as the ease and accessibility of doing so. Recycle My Electronics communicates to national and local audiences the significance of electronics recycling and the importance of recovering valuable resources in a safe, secure and environmentally sound manner.

6.1 Communication Goals

Specific communication goals include:

- Maintain program awareness (key performance indicator), as disclosed in the EPRA PEI annual impact report.
- Communicate the importance of recycling EOLE through the EPRA/Recycle My Electronics program, and specifically the environmental benefits, with a focus on collecting electronics recycling, as a call-to-action.



- Educate PEI residents and businesses about what electronic products are included in the PEI Program.
- Inform PEI residents and businesses of where, how, and when EPRA drop-off locations can be accessed.

6.2 Communication Components

To maintain program awareness performance, EPRA/Recycle My Electronics will continue to deliver an integrated, multi-dimensional communications strategy, supported by a variety of communication mediums and materials.

Integrated Campaigns. EPRA/Recycle My Electronics' integrated advertising campaigns take place during strategic campaign frames, such as Earth Month (April) and Circular Economy Month (October), in Canada. During these timeframes, media interviews and a strong digital strategy will complement ad-messaging and aim to keep EPRA/Recycle My Electronics top-of-mind residents and businesses.

Traditional Advertising & Public Relations: Communications for the public are very much call-to-action focused, encouraging residents to find their nearest drop-off location and to recycle. A critical component of our waste diversion initiative is strong public awareness and program accessibility, and this continues to be a priority for messaging behind EPRA/Recycle My Electronics.

Ops Communications. EPRA/Recycle My Electronics continues to extend reach through the drop-off locations across the province. As new drop-off locations are added and/or the Regulations are amended, EPRA/Recycle My Electronics responds with updating communication materials for residents, businesses, stewards, and drop-off locations, including new depot signs, brochures tent cards and web. EPRA/Recycle My Electronics also offers curbside rejection stickers to allow haulers to tag and leave electronic waste at the curb, so it goes into the recycling drop-off location instead of landfill.

Steward Support and Point-of-Sale Materials: EPRA/Recycle My Electronics offers a toll-free, bilingual call-centre to accommodate inquiries from residents and stakeholders. The call-centre helpline will continue to be an important communication tool, along with point-of-sale (POS) materials, webinars, company newsletters and product clarification updates to keep the steward audience engaged. Examples of POS materials can be found below.

Program Brochure

<https://recyclemyelectronics.ca/ordering/product/prince-edward-island-program-brochure-english>

<https://recyclemyelectronics.ca/ordering/product/prince-edward-island-program-brochure-french>

Tent Card

<https://recyclemyelectronics.ca/ordering/product/prince-edward-island-tent-card-english>

<https://recyclemyelectronics.ca/ordering/product/prince-edward-island-tent-card-french>

Extended Education. EPRA/Recycle My Electronics will continue to offer educational material, geared to young Canadians and educators. The importance of recycling electronics is promoted through the EPRA and Recycle My Electronics websites. Access here: <https://recyclemyelectronics.ca/pei/articles/education>

EPRA/Recycle My Electronics has also developed videos and podcasts on electronics recycling that are available for viewing and download on our website: <https://recyclemyelectronics.ca/pei/articles/videos>

Responsive Communication Materials. EPRA will continue to seek feedback, to ensure stakeholders are receiving the communication and materials they require to do their part. Steward and program awareness polling will continue to be conducted on an annual basis to determine satisfaction in stewardship relations, and public perception and awareness of electronics recycling in the province.

7.0 Performance Measurements and Continuous Improvement

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

Table 1 Performance Measurements

Indicator	Performance Measure
Operational	Total EOLE collected (metric tonne, MT) Total EOLE collected per capita (kg)
Financial	Total program cost per MT EOLE collected
Awareness	Percentage of population aware of the program
Accessibility	Percentage of the population covered by collection sites Total number of collection sites

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

Table A.1 EPRA Drop-off Locations in Prince Edward Island

Location	Civic Address
IWMC, Brockton, West Prince	2202 Dock Road Route #150
IWMC, New London, Central	10142 Route #6
East Prince Waste Management Facility, Wellington Centre (IWMC)	29786 Route #2
IWMC, Dingwell Mills, North Kings	100 Selkirk Road, Route #309
IWMC, Murray River, South Kings	378 Cape Bear Road, Route #18
GFL, Charlottetown (IWMC)	7 Superior Crescent
GFL, Summerside	175 Industrial Crescent
Aubrey's Bottle Exchange Ltd., Charlottetown	29 Garfield Street
Don's Bottle Exchange, Summerside	601 Notre Dame Street
Staples Canada Inc., Charlottetown	655 University Avenue
Staples Canada Inc., Summerside	57 Water Street
Best Buy Canada, Charlottetown	191 Buchanan Drive
Kent Building Supplies, Charlottetown	65 Walsh Road

Figure A.1 EPRA Collection Network Map

