



Tim LeBlanc, CEO  
Recycle New Brunswick  
227 Main St. Fredericton, NB  
E3A 1E1

Dear Mr. LeBlanc,

**Re: Electronics Products Recycling Association (EPRA) End-of-Life Electronics Stewardship Plan Renewal for New Brunswick.**

I am pleased to submit the updated EPRA Electronics Stewardship Plan in accordance with the regulation requirements.

Thank you,  
Karen Ulmanis  
Program Director – EPRA NB

Cc:

Cliff Hacking, President and CEO, EPRA  
Maylia Parker, Executive Director, Atlantic Canada EPRA  
Sandra Ellis, Program Manager, RECYLCENB





## End-of-Life Electronics Stewardship Plan New Brunswick

**Submitted:** June 23, 2025, revision October 30, 2025

**Submitted to:** Recycle New Brunswick (RECYCLE NB)

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

**For the Period:** January 1, 2026, to December 31, 2030

**Contact:** Karen Ulmanis, Program Director, Electronic Products Recycling Association New Brunswick (EPRA)

## Table of Contents

Introduction.....	1
1. Program Principles .....	1
2. Management Structure.....	1
3. Obligated Producers .....	2
4. Program Funding.....	2
5. Collection, Transportation, and Consolidation.....	4
6. End-Of-Life-Electronics Handling .....	7
7. Communication and Public Awareness .....	11
8. Management of Environmental Impacts .....	13
9. Reporting and Performance.....	16
10. Dispute Resolution .....	19
11. Additional Information.....	19
Appendices.....	21
Appendix 1 – List of Designated Electronic Products by Categories of Material .....	21
Appendix 2 – List of EPRA NB Registered Stewards .....	22
Appendix 3 – List of Approved Drop Off Locations.....	24
Appendix 4 – Drop off Location Audit Sheets.....	26
Appendix 5 – Electronic Recycling Standards .....	27
Appendix 6 - Recycler Qualification Process, Reuse & Refurbishing Program .....	32
Appendix 7 – List of Obligated Electronics Prior to January 1, 2026.....	37

## Introduction

Canada's electronics industry created EPRA as the national not-for-profit entity chartered with improving the efficiency and effectiveness of Canada's industry-led and regulated electronics stewardship programs.

Members of Electronics Product Stewardship Canada (EPSC) and the Retail Council of Canada (RCC) established EPRA in 2011.

Electronic Products Recycling Association New Brunswick (EPRA NB) is pleased to submit this Stewardship Plan for regulated end-of-life electronics (EOLEs) in New Brunswick (NB). See [Appendix 1](#) for complete list of designated products.

As of 2025, EPRA NB has expanded to 83 drop-off locations throughout the province and has collected close to 7500 metric tonnes of EOLEs since inception in March of 2017. Looking forward, EPRA NB will continue to strengthen public engagement and accessibility, empowering NB residents and businesses to divert designated EOLEs from our landfills.

## 1. Program Principles

EPRA New Brunswick's stewardship program:

- Is consistent with industry's guiding principles for stewardship programs, including creating a level playing field and harmonizing with other jurisdictions, where possible, to create efficiencies.
- Is open to all producers; please refer to [Appendix 2](#) for a current list of registered EPRA NB stewards.
- Achieves a high level of compliance and eliminates the potential for free riders with the assistance of Recycle New Brunswick (Recycle NB).
- Addresses the issue of orphan, historic, and imported products from companies without a New Brunswick or Canadian presence
- Ensures unwanted and designated EOLEs are recycled in a responsible manner, meeting all occupational health, safety and audit provisions of the Electronics Recycling Standard (ERS).
- Ensures the program is delivered in an environmentally sound and economically efficient manner.
- Includes public transparency for financial and environmental reporting.

## 2. Management Structure

EPRA NB has a bilingual Program Director located in the province who is responsible for all aspects of the program including:

- Working with Recycle NB.
- Working with the Department of Environment and Local Government.
- Establishing and maintaining a drop-off network for the program in NB.
- Establishing and maintaining the infrastructure for transportation of materials collected from the drop-off network.
- Overall day-to-day management of the collection, transportation, and processing of EOLEs in NB.
- Promoting and educating NB residents on responsible, industry-led electronics recycling.

**Recycle NB's Electronic Industry Advisory Committee** - EPRA NB will continue to work co-operatively with Recycle NB and will make every effort to attend the Recycle NB led Industry Advisory Committee meetings. EPRA NB will be pleased to provide a program update on the successes and opportunities for the program while respecting the confidential nature of its contractual relationships.

**Recycle NB's Waste Audit** - EPRA NB is committed to engaging in Recycle NB facilitated waste audits alongside other PROs in New Brunswick. Given the critical importance of establishing accurate and meaningful diversion targets, EPRA NB requires active involvement in the formulation of waste audit guidelines to ensure the integrity, transparency and applicability of the data collected, ultimately supporting the setting of effective, evidence-based targets for diversion outcomes.

### 3. Obligated Producers

The New Brunswick *Designated Materials Regulation - Clean Environment Act*, requires that producers register with the Recycle NB Board directly. As the producer responsibility organization representing producers, EPRA NB will request all EPRA registrants to be sure they fulfill this regulatory requirement between themselves and Recycle NB.

EPRA proactively puts processes in place to aid producers in ensuring they meet all regulatory requirements of the program.

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

- Working with Recycle NB to share registration lists in order that Recycle NB can follow up as required with producers.
- For producers that are registered with only EPRA (and not Recycle NB), EPRA will continue to notify the producer that their obligation is to register with Recycle NB per the New Brunswick *Designated Materials Regulation - Clean Environment Act* and provide the link to the Recycle NB registration.
- Providing producers with point-of-sale materials that educate themselves and the public on the recycling program provisions.
- Advise Recycle NB of obligated producers, including on-line entities selling designated products into the province, that EPRA becomes aware of who are not complying with the regulatory requirements such as reporting, remittance, embedded fees, and any other non-compliance that may require enforcement.

### 4. Program Funding

#### *Fee Per Unit Reporting & Remittance*

Obligated producers, registered under the EPRA NB plan, remit a recycling fee per unit (FPU) to EPRA NB for their previous month's net sales (total sales less returns) of new products listed under the *Designated Materials Regulation*. Entities that meet our small remitter provisions may remit less frequently. These fees fund the entirety of the program.

Because the product supply chain is complex and electronics are sold through a variety of channels, each registered steward is classified as either a “Remitter” or “Pay-on-Purchase” (POP) steward. While a remitter would usually be a larger entity (e.g. manufacturer, national retailer or distributor), they can also be a small, New Brunswick-based reseller or retailer. The POP classification was introduced to minimize the administrative burden of monthly reporting on these smaller, local resellers and retailers. These smaller, local businesses may choose to be either a Remitter or POP.

### ***Setting the Recycling Fee Per Unit***

The FPU for each designated product is designed to reflect the cost of managing that product. The FPU provides sustainable funding for collection, handling, consolidation, transportation, recycling, communications, public awareness, compliance/ administration, research and development, and environmental audits. It allows all New Brunswickers to drop-off designated EOLEs at approved drop-off sites at no charge with the assurance that these items will be responsibly recycled and diverted from landfills.

The FPU is set by product type. EPRA NB undertakes regular financial reporting to monitor revenue generated by the program per category and to ensure that funds are sufficient to fund all program activities. To ensure long-term sustainability, the program has developed a contingency reserve, representing the accumulated surplus or deficit of the program from inception. The reserve is necessary to ensure the program is not destabilized if collection and recycling costs exceed the funds available. This can happen in times of economic downturn or other unforeseen events, nevertheless requiring an uninterrupted, responsible electronics recycling service to continue. The contingency reserve is planned to be maintained at roughly twelve to eighteen months of operating costs.

EPRA will consider adjusting the FPU rates if the reserve moves away from the twelve to eighteen month target. The EPRA NB program shall continue to be audited annually by an independent external financial auditor.

### **Research and Development**

**(j) information on current and future research and development activities in the Province related to the management of the designated material;**

EPRA NB is committed to funding ongoing research and development (R&D) to enhance the management of designated EOLEs in the province. In 2023, we conducted an Available to Collect study to assess the volume of EOLEs potentially entering the recycling stream. In 2024, we followed this with a sampling study to update our current weight estimate of EOLEs currently available for recycling. Looking ahead to 2026 and beyond, examples of R&D include our introduction of unique stand alone drop off recycling bins supporting collection at commercial and large residential buildings, as well as our commitment to participate along side other provincial PROs in waste audits, facilitated by Recycle NB.

These research initiatives help us refine our program strategies, improve accessibility, awareness and landfill diversion targets and are part of our ongoing commitment to improving EOLE recycling in NB.

EPRA NB will notify Recycle NB at least one month prior to performing future R&D activities in New Brunswick that are intended to support compliance with the program plan and have not yet been identified in the plan.

## 5. Collection, Transportation, and Consolidation

(a) information on the storage, collection, transportation, recycling, processing, disposal and other handling of designated electronic waste, including the designated electronic waste of other producers;

EPRA NB does not store end-of-life electronics (EOLEs) prior to processing beyond the minimal time necessary for consolidation. Once dropped off at an approved collection site, EOLEs are typically, picked up within 30 days, transported to our current consolidation center located at **135 Belanger Street, Grand Falls, NB**, and shipped within 10 business days to one of our approved processors (see Section 6 for full list of facilities). This ensures secure handling, responsible recycling, and minimal risk of environmental impact.

EPRA NB provides province-wide collection for all designated EOLEs through a network of convenient, accessible, and free drop-off sites for both residents and businesses.

### Drop-Off Site Requirements

- Strategically located to ensure province-wide access, with locations kept current on the EPRA NB website and reported annually. See [Appendix 3](#) for current list.
- Open at least 30 hours per week, including a minimum of four hours on Saturdays (excluding statutory or civic holidays), or as otherwise approved by EPRA NB.
- Adequate space for the safe and efficient handling of designated EOLEs and for the secure storage of designated EOLE for up to 30 days prior to pick up
- Ongoing training of staff.
- Willingness to accommodate unscheduled audits by EPRA NB or its designate. See [Appendix 4](#) for Audit Procedure.
- Full compliance with all terms of their EPRA NB agreement.

### Transportation Requirements

- Consistent, reliable service in line with scheduled pickups.
- Safe handling and loading practices to reduce risk of injury or environmental harm.
- Full compliance with transportation regulations.
- Secure transport measures to prevent loss, theft, or unauthorized access, such as the use of chain-of-custody logs, trained personnel, secure loading/unloading procedures, and immediate reporting protocols.
- Willingness to accommodate unscheduled visits by EPRA NB or its designate.

### Recycler and Processor Requirements

- Actively processing EOLEs sent to them by EPRA NB.
- Verified and approved through the Recycler Qualification Office (RQO) and meeting all Electronics Recycling Standard (ERS) requirements (see [Appendix 5](#)).

- Implementing controls to safely manage hazardous materials, including proper storage, waste segregation, and spill response.
- Providing appropriate personal protective equipment (PPE) and training for employees, conducting regular safety inspections, and maintaining emergency plans.
- Safely managing materials of concern, such as mercury and lead, in compliance with applicable provincial and federal regulations.
- Safeguarding against unauthorized access to data on devices through documented procedures, controlled access, and data destruction measures verified via RQO audits.
- Properly disposing of non-recyclable materials (e.g., wood, speaker carpeting, foams, magnetic tapes, shredder fluff, CDs, paper, cardboard, floor sweepings) as outlined in ERS standards.
- Willingness to accommodate scheduled audits by EPRA NB or its designate.

Through regular audits and ongoing oversight, EPRA NB ensures that all program service providers adhere to these requirements.

## Collection Network

**(c) information on the province-wide collection system to be used by the consumer, including return facilities, by category of material;**

EPRA NB has established a comprehensive province-wide collection system that ensures convenient access for residents and businesses to responsibly recycle designated EOEs. The program operates through multiple collection channels to maximize diversion from landfills. Please note that some locations may have restrictions on what is accepted; for details, please visit our website.

### Table One – Drop-Off Network and Accepted Material Matrix

Please note that some locations may have size restrictions on what they accept; for details, please visit our website.

Collection Network	CATEGORY OF MATERIAL					
	Personal Computing Units (PCU)	Displays	Small Appliances	Microwaves	Floor Standing Copiers	Other Obligated Products
Redemption Centers	x	x	x	x	x	x
Participating Retail Partners	x	x	x	x		x
Non-Profit and Private Business Partnerships	x	x	x	x	x	x

CATEGORY OF MATERIAL CONTINUED						
Collection Network	Personal Computing Units (PCU)	Displays	Small Appliances	Microwaves	Floor Standing Copiers	Other Obligated Products
Community-Based Recycling Bins	x	x	x	x		x
Bulk Pick-Up Services for Businesses	x	x	x	x	x	x
Regional Landfill + Transfer Stations	x	x	x	x	x	x

### Collection Network

**Redemption Centers** – EPRA NB partners with many existing beverage container redemption centers throughout the province, allowing consumers to drop off all categories of material of designated EOLEs. These facilities provide a convenient and recognized network for recycling.

**Participating Retail Partners** – Select retailers, like Staples and Best Buy voluntarily participate as collection sites, enabling consumers to return their designated EOLEs when purchasing new products or as a stand-alone recycling option.

**Non-Profit and Private Business Partnerships** – EPRA NB collaborates with non-profits, municipalities, and private businesses to expand collection accessibility. These partnerships like ones with Salvation Army, Habitat for Humanity and the City of Fredericton provide additional drop-off sites for consumers.

**Community-Based Recycling Bins** – To further improve accessibility, EPRA NB has deployed secure, stand-alone collection bins in strategic community locations such as McAllister Mall in Saint John and Marysville Place in Fredericton, allowing for the drop-off of smaller designated EOLEs at the convenience of residents.

**Bulk Pick-Up Services for Businesses** – To support institutional, commercial, and industrial (IC&I) generators of designated EOLEs, EPRA NB offers scheduled bulk pick-up services. Businesses, schools, and other organizations can request a collection via the "Book My Pick Up" service.

**Regional Landfills and Transfer Stations** - Our network includes most regional landfills and transfer stations across the province. Leveraging these familiar waste management facilities ensures residents can conveniently recycle electronics where they already go to manage other waste.

## Remote Areas

**(e) information on service delivery to remote or rural areas;**

As a broad guideline, EPRA NB will look to source collection sites or collection events within a 30-minute drive of residents but recognizes that there may be challenges in certain rural and remote regions.

EPRA NB has developed and will maintain an accessibility coverage of minimum sixty drop off locations providing minimum 95% accessibility based on:

1. Urban within 30-minute drive
2. Rural within 45-minute drive

In the event accessibility coverage drops below the target of 95%, EPRA NB will add, where practical, drop-off sites in areas that require coverage. If it is not possible to open a drop off location in the identified area, EPRA will work with the community to find alternative recycling options for residents and businesses, such as special collection events or community-based recycling bins.

## 6. End-Of-Life-Electronics Handling

**d) the location of storage, recycling, processing, disposal and other handling facilities for designated materials;**

Designated EOLEs are picked up at approved EPRA NB drop-off sites on a weekly basis. They are then transported to our current consolidation center located at 135 Belanger Street, Grand Falls NB, where they are consolidated and transported on a weekly basis to an approved EPRA NB processor.

EPRA NB has agreements in place with processors, which include timely processing of all electronics received and regular reporting.

Currently, EPRA NB works with three processing facilities:

<b>FCM Quebec</b> 91 Rue Boisjoly Lavaltrie, Quebec J5T 3L7 OR	<b>FCM Nova Scotia</b> 24 Industrial Way Elmsdale, NS B2S 2L4
<b>eCycle Solutions Inc.</b> 35 Rue Robineault, Salaberry-de-Valleyfield, QC J6S 5J9	

EPRA NB advise Recycle NB of any changes to processing facilities within 10 days of the change.

	<b>Component/Material Type</b>	Country Location
Storage	n/a	None
Processing	All Components	Canada
Recycling	Plastic Leaded Glass Non-leaded Glass Ferrous Metals Mixed Metals Copper-bearing Materials Aluminum Batteries Metal Dusts Mercury Lamps Ethylene Glycol Copper Yokes Circuit Boards Liquids and Solvents (such as carpet/floor cleaner) Media Commodity Grade Copper	Canada/United States/Malaysia
Disposal	Wood, Unrecoverable Plastic, Rubber, Fibers, Speaker Foam and Carpet	Canada
Energy Recovery	Ink and Toner	Canada/United States

## Existing Networks

g) a description of the manner in which existing collection and processing systems have been taken into account to maximize waste diversion in the Province;

EPRA NB has integrated existing collection and processing systems to maximize waste diversion in NB. The program leverages the province's 12 Regional Service Commissions waste management infrastructure of landfills and transfer stations along with the well-established network of Redemption Centers, as drop-off sites for EOEs. This approach maximizes waste diversion by providing convenient access for residents and businesses while minimizing the need for new infrastructure.

Collected EOEs are transported weekly via a dedicated system, consolidating materials at a central location before being shipped to certified processors in Nova Scotia and Quebec. This efficient logistics model ensures regular pickups and reduces transportation costs.

## Management of End-of-Life-Electronics

(h) a management plan for designated material waste, by category of material, according to the following order of preference:

- (i) reuse of the designated material;
- (ii) recycling or composting of the designated material;
- (iii) recovery of energy produced by the designated material; and
- (iv) disposal of the designated material in accordance with the Act;

EPRA NB's approach to managing designated electronic follows the regulatory hierarchy: reuse, recycling, energy recovery, and disposal. Each category of material is addressed through targeted strategies and programs to maximize diversion and minimize environmental impact.

Categories of Material	
Reuse	Personal Computing Units (PCU) Displays Other Obligated Products Small Appliances Microwaves Floor Standing Copiers
Recycling	Personal Computing Units (PCU) Displays Other Obligated Products Small Appliances Microwaves Floor Standing Copiers
Energy Recovery	Does not apply to an entire category. Rather, any components of designated electronics that cannot be recycled will be considered for energy recovery. Examples are ink and toner cartridges.
Disposal	Does not apply to an entire category. Rather, in rare instances where downstream processors have exhausted other options, materials will be landfilled. Examples are wood, unrecoverable plastic, rubber, fibers, speaker foam and carpet.

i. **Reuse** - EPRA NB encourages the reuse of all unwanted electronics as the first option and delaying recycling until a device is end-of-life. This is promoted through the EPRA NB website and communications campaigns. Reuse of designated electronics may include gifting, donation, or resale. Residents and businesses choosing to reuse are advised to remove all personal or sensitive data. Promotion of reuse applies to all categories of materials:

- Personal Computing Units (PCU)
- Displays
- Other Obligated Products
- Small Appliances
- Microwaves
- Floor Standing Copiers

EPRA also partners with the federal Computers for Schools Plus (CFS+) program to support reuse of applicable electronic devices (primarily PCUs) in schools and other Canadian communities.

In addition, EPRA has established the Electronics Reuse & Refurbishing Program (ERRP) under the Recycler Qualification Office (RQO) to enable safe and responsible reuse and refurbishment of electronics. (Refer to [Appendix 6](#)). The EERP outlines minimum requirements for accreditation and ensures that reused products, particularly those that are data-bearing, are handled responsibly by qualified entities.

ii. **Recycling** - When reuse is not feasible, recycling is the next option. All categories of End-of-Life Electronics (EOLEs) are eligible for recycling:

- Personal Computing Units (PCU)
- Displays
- Other Obligated Products
- Small Appliances
- Microwaves
- Floor Standing Copiers

The recycling process typically involves primary processing (dismantling and sorting) and, if needed, downstream processing to transform materials into a new state or product to re-enter the manufacturing stream. Material flows are tracked to their point of final processing for recyclable materials or point of disposal for unrecyclable/hazardous components.

All recyclers must be approved through the Recycler Qualification Program (RQP). References include:

Electronics Recycling Standard – See [Appendix 5](#)

iii. **Recovery of Energy** - For certain materials where reuse or recycling is not viable, energy recovery is pursued. An example includes ink and toner cartridges, where harnessing energy from e-waste is the preferred end-of-life option.

iv. **Disposal as the Last Resort** - Disposal is used only when all other options have been exhausted. EPRA NB emphasizes that disposal is the last step in the waste management hierarchy. Selected materials with no viable recycling option—such as wood waste from older television consoles—are disposed of responsibly. All non-

recyclable electronic components collected under EPRA's program are managed according to the Responsible Recycling Version 3 (R2v3) standard, this includes:

- Identification and segregation of non-recyclable or hazardous components
- Use of licensed and regulated disposal facilities
- Verification of downstream vendors to ensure compliance
- Documentation and traceability of all materials from collection to final disposition
- Consideration of reuse, recovery, or recycling before disposal

Disposal is handled in a controlled, environmentally responsible manner, with full documentation to demonstrate compliance.

Through this approach, EPRA NB ensures that materials are reused, recycled, or used for energy-recovery, with disposal reserved as the final option.

## 7. Communication and Public Awareness

(k) a communications plan to inform consumers about the stewardship plan, including Free and Reasonable Access to Collection

- (i) information concerning reasonable and free access to a method of collection, and
- (ii) a plan for education and awareness;

The EPRA NB bilingual communication plan is designed to educate the residents and businesses of NB, ensuring they know the program is free, where to recycle, what to recycle, while encouraging residents to divert their EOLE from landfill through reuse first, followed by recycling.

EPRA NB ensures that consumers and businesses have free and reasonable access to collection services across the province:

- Public Access: A network of currently over 80 authorized drop-off locations, including return-to-retail sites and municipal depots, provides accessibility to most New Brunswickers within a 30-minute drive.
- Business Access: Our program offers free collection services to New Brunswick businesses, educational Book My Pick-Up institutions, and government offices.
- Support Services:

General Inquiries  
Email: [infoNB@recycleMYelectronics.ca](mailto:infoNB@recycleMYelectronics.ca).  
Toll-free: 1-888-567-4535

Program Director - Karen Ulmanis  
Email: [karen.ulmanis@epra.ca](mailto:karen.ulmanis@epra.ca)  
Phone: 506-804-4926

## Plan for Education and Awareness

EPRA NB employs a dual-strategy communications plan: a year-round "Always-On" strategy combined with twice-annual "Impact Campaigns" during Earth Month (April) and Circular Economy Month (October).

### Always-On Strategy

- Bilingual Website: Provides detailed program info, FAQs, and drop-off locator tools.
- Search Engine Marketing (SEM/SEO): Directs traffic to the website to educate users about what can be recycled and where.
- Geo-targeted Social Media Advertising: Custom campaigns on Meta (Facebook/Instagram) target specific communities to raise awareness and increase local participation.
- Business-to-Business Outreach: LinkedIn campaigns tailored to decision-makers in IC&I and ITAD sectors. Search-indexed "Book My Pick-Up" forms to encourage direct engagement with NB businesses.
- Steward Communications: Monthly bilingual updates, newsletters, 3R reporting tools. Free point-of-sale (POS) materials (brochures, tent cards).
- Educational Resources for Youth: Free interactive games, quizzes, and video content for school-aged children.
- Depot Signage & Community Tools: Branded bilingual signage at depots. Redirection stickers for municipal haulers to avoid improper curbside disposal.

### Impact Campaigns (Earth Month & Circular Economy Month)

Executed in both English and French across high-reach platforms:

- Media Channels: TV, radio, digital, social media, public relations, and print ads.
- Messaging Focus: Biannual campaigns highlight the recoverable resources, data security, accessibility, and EPRA's expertise.

### In addition, EPRA NB:

- Follows the Recycle NB Corporate Identity and Brand Standards Manual.
- Commits to submit an annual communications plan for each calendar year of the plan no later than November 30 of the preceding year.
- EPRA commits to submitting educational and consumer materials to Recycle NB for review in accordance with Recycle NB's current guidelines, which at present require inclusion of the Recycle NB logo on all materials and submission of materials to Recycle NB a minimum of 15 business days prior to intended use. Should Recycle NB's guidelines be updated, EPRA will adjust its submission process to remain aligned with the requirements in effect at that time.

## 8. Management of Environmental Impacts

### Reducing Environmental Impacts

**(i) a description of the efforts being made by the producer to redesign designated materials to improve opportunities for reuse and recycling;**

EPRA NB will continue to submit an annual report that will highlight various topics which may include: the electronics industry's advancements in designing environmentally responsible products that are more readily reused or recycled, analysis of market trends influencing the recovery and recycling of these devices and explore technological innovations that are shaping the future of electronics design and sustainability. This report submitted within our annual report will cover all categories of electronics, ensuring that all categories of material are accounted for within the program.

**(I) a management plan for designated material waste, by category of material, which shall provide for the implementation of environmental and human health and safety standards, which shall meet or exceed those provided by applicable law;**

To ensure that all materials collected, regardless of categories of material, are responsibly recycled, EPRA NB contractually requires all recyclers to meet the requirements of the Electronic Recycling Standard (ERS) and to have successfully completed the audit and approval process which may be updated from time to time in order to ensure they meet the ongoing needs of the programs.

#### Categories of Materials that fall under the requirements:

- Personal Computing Units (PCU)
- Displays
- Other Obligated Products
- Small Appliances
- Microwaves
- Floor Standing Copiers

#### Applicable references:

Electronics Recycling Standard – refer to [Appendix 5](#)

Electronics Reuse & Refurbishing Program – refer to [Appendix 6](#)

m) a plan for the elimination or reduction of the environmental impacts of designated material waste, by category of material;

EPRA NB's plan is designed to reduce the environmental impacts of designated electronics by ensuring they are collected through a robust province-wide network, transported efficiently, and processed only by approved facilities that meet stringent environmental and health standards. Our oversight includes regular audits, downstream tracking, and annual reporting to ensure materials are managed responsibly.

**By material category:**

- **Personal Computing Units (PCU):** Units are dismantled to recover circuit boards, processors, and hard drives. Precious and base metals are extracted for reuse and plastics are separated for recycling, reducing the demand for virgin material and preventing hazardous substances from entering the waste stream.
- **Displays:** Hazardous components such as leaded glass, mercury-containing backlights, and circuit boards are removed and processed under strict environmental controls. Recoverable metals and plastics are recycled, minimizing toxic releases.
- **Other Obligated Products**  
Includes desktop scanners, telephones, fax machines, digital cameras, computer desktop printers (including multifunction devices with fax or scanning capabilities), audio and video playback and recording systems, cellular phones, personal digital assistants, and similar handheld devices not capable of connecting to the Internet.  
These items are dismantled into plastics, metals, and circuit boards. All batteries are removed and managed through approved programs. Component-level recycling reduces landfill disposal and recovers valuable resources.
- **Other Obligated Products post January 1, 2026**  
Includes video game devices and peripherals, electronic readers, global positioning and navigation systems, external storage drives, and modems. These products are processed to recover circuit boards, precious metals, and plastics, with hazardous components directed to approved downstream processors.
- **Small Appliances:** End-of-life small appliances (e.g., toasters, hair dryers, vacuum cleaners) are shredded and sorted into ferrous metals, non-ferrous metals, and plastics. Recovered metals are reintroduced into manufacturing supply chains, reducing the need for raw extraction. Plastics are sorted for recycling.
- **Microwaves:** Microwaves are dismantled with a focus on safely removing capacitors and circuit boards. Metals such as copper, aluminum, and steel are recovered, while plastics are sorted for recycling. Hazardous components are treated through approved downstream vendors to eliminate environmental risk.
- **Floor Standing Copiers:** These units are disassembled, with toner cartridges, circuit boards, and batteries managed through approved recycling streams. High volumes of steel and plastics are recycled, while any residuals are directed to appropriate recovery or disposal methods in line with the ERS.

Through these material specific processes, EPRA NB's plan minimizes the environmental impacts of designated material waste by ensuring hazardous substances are responsibly managed, recyclable materials are recovered, and residual waste is reduced to the greatest extent possible.

## Green House Gas Emissions

**n) a description of greenhouse gas emissions resulting from the implementation of the stewardship plan and opportunities to reduce environmental impact;**

Most of the greenhouse gas (GHG) emissions associated with the EPRA NB program result from the collection and transportation of designated EOLEs from approved drop-off sites across NB to processing centers, and from these centers to end-markets in an effort to avoid landfill of potentially hazardous material and to recover valuable materials for re-entry into the supply chain. To reduce these emissions, EPRA NB continues to utilize a collection system that consolidates collection routes, reducing unnecessary travel and minimizing fuel consumption.

With 99% accessibility for residents across NB, EPRA NB's collection network ensures that most residents have a nearby drop-off depot, significantly reducing travel times and emissions from individuals driving longer distances to dispose of their electronics. This localized collection system not only makes recycling more convenient, but also directly contributes to lowering overall GHG emissions by minimizing unnecessary travel, both for consumers and collection trucks.

In collaboration with our drop-off sites, EPRA ensures that each bag of electronics is efficiently filled before being sent for transport, maximizing the load capacity of each pick-up. This practice reduces the number of trips required for collection, further decreasing fuel consumption and emissions associated with transportation.

In addition, EPRA NB takes advantage of backhaul lanes when transporting EOLEs to Quebec for recycling, further reducing costs and GHG emissions.

Building on these efficiencies, EPRA NB's transportation provider is a registered member of SmartWay, an initiative led by Natural Resources Canada (NRCan). SmartWay helps businesses improve fuel efficiency and reduce emissions by allowing carriers and shippers to benchmark their operations, track fuel consumption, and optimize performance. By implementing SmartWay technologies, EPRA's transport partner is actively working to mitigate its carbon footprint while ensuring that designated EOLEs are transported as sustainably as possible.

While sustainable transportation practices play a crucial role in reducing emissions, the benefits of responsible recycling extend even further. Recycling reduces the demand for new raw materials, which helps lower the carbon emissions associated with mining and manufacturing. By recovering and reusing valuable materials such as metals, glass, and plastics, recycling minimizes the environmental impact of electronic production.

Through a combination of efficient collection systems, optimized transportation, and responsible recycling, EPRA NB is committed to reducing greenhouse gas emissions and promoting environmental

sustainability. By continuing to enhance its logistics and recycling efforts, EPRA NB helps ensure that NB residents have an accessible, efficient, and environmentally responsible way to dispose of their electronics.

Additionally, EPRA NB is committed to identifying opportunities to reduce environmental impact and to annual tracking and reporting the GHG emissions associated with the collection, transportation, and processing of electronics under our program, ensuring that the environmental benefits of recycling are maximized while unavoidable emissions are measured.

## Emergency Reporting

As per the PRO Emergency Reporting Clause, should EPRA NB discover an environmental emergency, EPRA NB will immediately notify, whether during normal business hours or after hours, Recycle NB and the appropriate location of the New Brunswick Department of the Environment and Local Government.

## 9. Reporting and Performance

### Categories of Material

**(b) a description of categories of material to be used for the purposes of annual reports and performance measures and targets;**

EPRA NB has defined the following categories of material to be used for the purposes of annual reports and performance measures and targets for 2026 and 2027.

Table Two – Obligated Material prior to January 1, 2026 – to be used in the calculation of performance measures for 2026 and 2027

Categories of Material	Designated Electronic Products
Personal Computing Units (PCU)	desktop, laptop and notebook computer and the computer's central processing unit
Displays	television, computer monitor
Other Obligated Products	keyboard, mouse and cable, computer desktop printer and desktop printer with scanning or fax capabilities, desktop scanner, audio and video playback and recording system, telephone, cellular phone and other wireless communication devices, fax machine, personal digital assistant and other similar handheld devices not capable of connecting to the Internet, digital camera, and analog or digital video camera

Table Three - EPRA NB has defined the following categories of material to be used for the purposes of annual reports under section 45(1).

Categories of Material	Designated Electronic Products
Personal Computing Units (PCU)	desktop, laptop and notebook computer and the computer's central processing unit
Displays	computer monitor, televisions
Other Obligated Products	desktop scanner, telephone, fax machine, digital camera, computer desktop printer and a desktop printer with scanning or fax capabilities, audio and video playback and recording system, cellular phone and any other wireless communication devices, personal digital assistant and any other similar handheld devices not capable of connecting to the Internet, analog or digital video camera, keyboard, mouse and cable,
Other Obligated Products post January 1, 2026	video game device or peripheral, electronic reader, global positioning and navigation system, external storage drive and modem,
Small Appliances	floor and carpet care appliance, countertop cooking appliance, device used for time measurement, kitchen scale or bathroom scale, garment care appliance, device used for cutting food and opening or sealing containers or packages, personal care, appliance, device used for time measurement, portable air treatment unit, excluding air conditioners
Microwaves	countertop microwave oven
Floor Standing Copiers	floor-standing printer, copier or any floor-standing unit that combines printing, copying, scanning and other functions.

## Geographic Reporting

(f) the geographic areas to be used for the purposes of the annual report;

EPRA NB will utilize data organized by geographical areas that align with the 12 Regional Service Commission (RSC) boundaries for purposes of the annual reporting of collected weight of designated EOLEs.

## Regional Service Commissions:

- Northwest Regional Service Commission (RSC 1)
- Restigouche Regional Service Commission (RSC 2)
- Chaleur Regional Service Commission (RSC 3)
- Acadian Peninsula Regional Service Commission (RSC 4)
- Greater Miramichi Regional Service Commission (RSC 5)
- Kent Regional Service Commission (RSC 6)
- Southeast Regional Service Commission (RSC 7)
- Kings Regional Service Commission (RSC 8)
- Fundy Regional Service Commission (RSC 9)
- Southwest New Brunswick Service Commission (RSC 10)
- Capital Regional Service Commission (RSC 11)
- Western Valley Regional Service Commission (RSC 12)

## *Key Performance Indicators*

### Performance measures and targets

44(1) Each producer that is subject to a stewardship plan shall submit to the stewardship board for approval one or more performance measures and targets, by category of material, that the producer will use to assess the effectiveness of the plan.

44,(3) (b) in the case of a renewed plan, at the time the plan is submitted to the stewardship board under section 41, or

(c) in the case of an amended plan for which the stewardship board requires new performance measures and targets, within the period directed by the stewardship board.

- **Public Awareness** Target: 79%

Awareness is measured through annual third-party public polling and reflects the percentage of NB residents who are aware of the electronic recycling program. This measure applies across all categories and reflects our outreach and education efforts. This target represents all categories of material as awareness influences recycling for all designated EOLEs.

- **Accessibility** Target: 95%

The third-party calculation uses the most recent Census population data to measure how far people in urban and rural areas are from the nearest EPRA collection facility. By mapping road distances and drive times, it shows what percentage of the population has sufficient access to recycling locations. Sufficient access has been defined as a drive time of 30 minutes in urban areas and 45 minutes in rural areas. This target represents all categories of material as all drop-off sites accept all designated EOLEs, with the exception of some size restrictions

- **Collected Tonnage** Target: 900 Metric Tonnes.

EPRA New Brunswick proposes an annual tonnage target of 900 MT to reflect current market conditions. Ongoing product light-weighting, increased reuse activity, and the presence of alternative diversion streams have significantly impacted the overall weight of materials entering the recycling system. This ensures targets remain realistic, data-driven, and aligned with the evolving composition of electronic products available for collection.

For the years 2026 and 2027 this target will pertain only to the following categories, displays, PCUs, and other obligated electronics prior to January 1, 2026. See [Appendix 7](#) for complete list.

EPRA New Brunswick reserves the right to amend or replace the current collection targets starting in 2028 to reflect the impact of the expanded list of obligated products being introduced in 2026. As new product categories are added, a two-year period will be required to gather sufficient collection data, evaluate performance trends, and establish an accurate baseline.

## 10. Dispute Resolution

(o) a dispute resolution process to deal with disputes between a producer and a service provider; and

The Program has incorporated normal commercial dispute resolution provisions into contracts with third parties. EPRA encourages a timely, staged approach to resolving disputes in stages to ensure fairness and efficiency:

**Stage 1 – Local Resolution:** Program Director reviews the issue, discusses with the provider, and seeks resolution. Written record kept.

**Stage 2 – Senior Management:** If unresolved, escalated to senior management for review and decision.

**Stage 3 – Arbitration:** If a dispute can not be resolved through informal discussion, the matter will be referred to the binding arbitration in accordance with the New Brunswick Arbitration Act.

EPRA is committed to timely communication, accountability, and good faith resolution.

## 11. Additional Information

(p) information or documents respecting any other matter provided for under Divisions 2 to 9.

Recycle NB requires the following additional requirements, which are included in program plan.

- A commitment to have on staff a bilingual person with residence in New Brunswick.
- A commitment to submit an annual communications plan for each calendar year of the plan no later than November 30 of the preceding year.

- EPRA commits to submitting educational and consumer materials to Recycle NB for review in accordance with Recycle NB's current guidelines, which at present require inclusion of the Recycle NB logo on all materials and submission of materials to Recycle NB a minimum of 15 business days prior to intended use. Should Recycle NB's guidelines be updated, EPRA will adjust its submission process to remain aligned with the requirements in effect at that time.
- A commitment that the amount held in any reserve fund for the New Brunswick stewardship program will not usually exceed the average 1-year's operating expense over the life of the plan.
- A commitment to follow Recycle NB's Emergency Reporting Clause.
- A commitment to participate along side other provincial PROs in waste audits, facilitated by Recycle NB.

Additionally, the Stewardship Plan must include a list of producers whom the plan is being submitted on behalf of, which includes the producer's Recycle NB Registration Identification Number.

## Appendices

### Appendix 1 – List of Designated Electronic Products by Categories of Material

Categories of Material	Designated Electronic Products
Personal Computing Units (PCU)	desktop, laptop and notebook computer and the computer's central processing unit
Displays	computer monitor, televisions
Other Obligated Products	desktop scanner, telephone, fax machine, digital camera, computer desktop printer and a desktop printer with scanning or fax capabilities, audio and video playback and recording system, cellular phone and any other wireless communication devices, personal digital assistant and any other similar handheld devices not capable of connecting to the Internet, analog or digital video camera, keyboard, mouse and cable,
Other Obligated Products post January 1, 2026	video game device or peripheral, electronic reader, global positioning and navigation system, external storage drive and modem,
Small Appliances	floor and carpet care appliance, countertop cooking appliance, device used for time measurement, kitchen scale or bathroom scale, garment care appliance, device used for cutting food and opening or sealing containers or packages, personal care, appliance, device used for time measurement, portable air treatment unit, excluding air conditioners
Microwaves	countertop microwave oven
Floor Standing Copiers	floor-standing printer, copier or any floor-standing unit that combines printing, copying, scanning and other functions.

## Appendix 2 – List of EPRA NB Registered Stewards

Name	RNB ID
604402 N.B. Ltd	RNBE398
9192-2542 Quebec Inc	RNBE498
Acer America Corporation	RNBE414
Ademco III Ltd.	RNBE435
Ahearn & Soper Inc	RNBE377
Amazon.com.ca, ULC.	RNBE115
Apple Canada Inc.	RNBE79
ARLO TECHNOLOGIES CANADA LIMITED	RNBE477
Avaya Canada Corp	RNBE127
Avnet International (Canada) Ltd.	RNBE197
Backman Vid-Comm Ltd.	RNBE110
Bass Pro Shops Canada ULC	RNBE252
BDI, a division of Bell Mobility Inc.	RNBE513
Bell Canada	RNBE113
Bell Mobility Inc	RNBE28
Best Buy Canada Ltd.	RNBE66
Bose Limited	RNBE330
Brother International Corporation (Canada) Ltd.	RNBE403
Cabela's Retail Canada Inc.	RNBE507
Canadian Tire Corporation, Limited	RNBE20
Canon Canada Inc.	RNBE33
Chateau Manis Electronics Inc	RNBE419
Christie Digital Systems Canada Inc.	RNBE227
Cisco Systems Canada Co.	RNBE199
Costco Wholesale Canada Ltd.	RNBE23
CTG Brands Inc,	RNBE381
Dell Canada Inc.	RNBE18
Dollarama LP	RNBE124
Dymaxion Research Limited	RNBE363
Dynabook Canada Inc.	RNBE431
Dyson Canada Limited	RNBE515
Edco Electronics Inc./Estded Industries Inc.	RNBE360
Epson Canada Limited	RNBE10
Forerunner Canada Inc.	RNBE394
Fujitsu Canada Inc.	RNBE14
GE HealthCare Technologies Canada	
Gentec International	RNBE350
Google Canada Corporation	RNBE334

Groupe BMTC inc.	RNBE512
Hisense Canada Co., Ltd.	
Hitfar Concepts Ltd	RNBE364
Home Depot of Canada Inc.	RNBE107
Home Hardware Stores Limited	RNBE51
HP Canada Co	RNBE27
IDEXX Laboratories Canada Corporation	RNBE504
Indigo Books & Music Inc.	RNBE258
Ingram Micro Inc.	RNBE32
Jetview Electronics Ltd.	RNBE397
JVCKENWOOD Canada Inc.	RNBE263
Konica Minolta Business Solutions (Canada) Ltd.	RNBE11
Le Groupe Jean Coutu (PJC) inc.	RNBE36
Lenbrook Industries Limited	RNBE94
Lenovo (Canada) Inc.	RNBE331
Lexmark Canada Inc.	RNBE96
LG Electronics Canada, Inc.	RNBE87
Lounsbury Furniture & Appliances	RNBE149
MEC Mountain Equipment Company Ltd.	
Newegg Canada Inc.	RNBE322
Nikon Canada Inc.	RNBE39
Oracle Canada ULC	RNBE25
Panasonic Canada Inc.	RNBE13
Powernode Computer Inc.	RNBE260
Professional Computer Comptrollers, Inc.	RNBE188
RAE Industrial Electronics Ltd	RNBE382
Randmar Inc	RNBE298
Razer USA LTD	
RED APPLE STORES INC.	RNBE279
Ricoh Canada Inc.	RNBE78
Robert Bosch Inc.	RNBE320
Roland Canada Ltd.	RNBE328
Samsung Electronics Canada Inc.	RNBE174
Sharp Electronics of Canada Ltd	RNBE285
SOFTCHOICE LP	RNBE185
Sonos, Inc.	RNBE464
Stanley Black & Decker Canada Corporation	
STAPLES THE BUSINESS DEPOT	RNBE99
Steelcase Canada Ltd	RNBE465
TD SYNNEX CANADA ULC	RNBE173
TELUS Mobility	RNBE210
The Brick Warehouse LP	RNBE324
Tonies US, Inc.	RNBE534

TTX Canada Inc.	RNBE131
Ubiquiti Canada Inc.	RNBE517
Visions Electronics Limited Partnership	RNBE375
Wal-Mart Canada Corp.	RNBE136
Winners Merchants International	RNBE75
Xerox Canada Ltd.	RNBE17
Yamaha Canada Music Ltd	RNBE302

### Appendix 3 – List of Approved Drop Off Locations

This list is subject to change, for the most recent list, visit our website.

Allardville	1
Atholville	1
Baie-Saint-Anne	1
Bath	1
Bathurst	3
Berry Mills	1
Blackville	1
Bouctouche	1
Campbellton	1
Cap-Pele	1
Caraquet	1
Chipman	1
Cocagne	1
Dalhousie	1
Dieppe	2
Doaktown	1
Edmundston	1
Fairisle	1
Fredericton	9
Grand Bay-Westfield	1
Grand Falls	1
Grand Manan	1
Hampton	1
Hanwell	1
Harfield	1
Harvey	1
Hillsborough	1
Lawrence Station	1
Memramcook	1
Miramichi	2
Moncton	10
Oromocto	1
Perth Andover	1

Petit Rocher	1
Plaster Rock	1
Port Elgin	1
Portage St-Louis	1
Quispamsis	1
Richibucto	1
Riviere-Verte	1
Rothesay	1
Sackville	1
Saint George	1
Saint John	8
Saint Stephen	1
Saint-Antoine	1
Saint-Basile	1
Saint-Quentin	1
Salisbury	1
Savoie Landing	1
St. Croix	1
Sussex	2
Tracadie-Sheila	1
Woodstock	1

## Appendix 4 – Drop off Location Audit Sheets



### EPRA DROP OFF CENTER INSPECTION FORM

EPRA Drop off Center \_\_\_\_\_ DC# \_\_\_\_\_

Inspection Date \_\_\_\_\_

Check List	Yes	No	Notes as needed
<b>Access</b> – entry, exit and parking hazard free			
<b>Appearance</b> – property clear of debris and litter			
<b>Building</b> – appears in general good repair			
<b>Signage</b> – EPRA signs displayed and in good shape			
<b>Receiving area</b> – safe and hazard free			
<b>Electronics</b> – stored in a safe secure spot, none left outside in the elements.			
<b>Shipping</b> - Bags filled to top before picking up			
<b>Shipping</b> – tags are on each bag and paperwork is completed.			
<b>Supplies</b> - Shrink wrap and skids being used for EPRA only			
<b>Other observations</b>			

EPRA Signature \_\_\_\_\_

## Appendix 5 – Electronic Recycling Standards



---

# **ELECTRONICS RECYCLING STANDARD (ERS)**

## **2025**

**Version 5**  
**- August 2025 -**

## ELECTRONICS RECYCLING STANDARD (ERS)

All recyclers seeking to operate under an EPRA program must be reviewed and approved by the Recycler Qualification Office (RQO) under the Electronics Recycling Standard (ERS) prior to use.

Recycler requirements are determined based on the type of operations undertaken in alignment with the following three categories: Primary Processors; downstream recyclers of focus material; and downstream recyclers of non-focus materials.

All recyclers may be subject to annual review of the defined requirements as well as an on-site operational review.

### 1.0 PRIMARY PROCESSORS

R2 or eStewards certification is a prerequisite for RQO approval under ERS 2025. Primary Processors must also:

- 1.1 Demonstrate active material processing through established and sustainable processes certified under R2, or eStewards.
- 1.2 Maintain policies and practices to prohibit the use of child, prison or forced labour.
- 1.3 Possess workers' compensation coverage and a minimum of \$2M general liability insurance.
- 1.4 Maintain a documented procedure to provide notice of reportable incidents within 5 business days including: changes in name or ownership; fines or regulatory orders; spills; fires; or reportable injuries or changes in R2 or eSteward certification status.
- 1.5 Maintain closure plan financial assurance, based on the maximum material capacity as follows:
  - 1.5.1 Maximum capacity less than 50 MT = \$25k minimum;
  - 1.5.2 Maximum capacity of 50 to 149 MT = \$75k minimum;
  - 1.5.3 Maximum capacity of 150 to 499 MT = \$100k minimum;
  - 1.5.4 Maximum capacity of 500 MT or greater = \$125k minimum; or
  - 1.5.5 Where the facility is owned by the recycler, provide an approved Commitment and Waiver Letter accepting full responsibility and liability to cover all costs in the event of a closure.
- 1.6 Maintain evidence of compliance with Canadian federal import and export regulations.
- 1.7 Re-use of EEE is permitted as per the Program contract with the following conditions.
  - 1.7.1 Approval from appropriate provincial program
  - 1.7.2 Reuse activities are identified in Recycler's R2 / e-stewards scope of approval
- 1.8 Process all EPRA material in accordance with the RQO defined scope of approval and downstream flow.



---

## **2 DOWNSTREAM RECYCLERS OF FOCUS MATERIALS**

- 2.1 Demonstrate active material processing through established and sustainable processes in conformance with a Focus Material Management Plan.
- 2.2 Maintain policies and practices to prohibit the use of child, prison or forced labour.
- 2.3 Possess adequate workers' compensation coverage and a minimum of \$1M general liability insurance.
- 2.4 Maintain a documented procedure to provide notice of reportable incidents within 30 business days including: changes in name or ownership; fines or regulatory orders; spills; fires; or reportable injuries, and if applicable changes to R2 or eSteward certification status.
- 2.5 Process all EPRA material in accordance with the RQO defined scope of approval and downstream flow.

## **3 DOWNSTREAM RECYCLERS OF NON-FOCUS MATERIALS**

- 3.1 Define the scope of operations and demonstrate active material processing through permitted and sustainable processes.
- 3.2 Maintain policies and practices to prohibit the use of child, prison or forced labour.
- 3.3 Possess adequate workers' compensation coverage and a minimum of \$500K general liability insurance.

## **4. Submission and Acceptance**

- 4.1 The organization is responsible for completing the required ERS Application Form and submitting it to the RQO along with associated supporting documentation.
- 4.2 The RQO will determine if the application is complete and sufficient supporting evidence of conformance has been provided to initiate the on-site operational review.
  - 4.2.1 Incomplete applications will be rejected and the applicant notified.
  - 4.2.2 Applications considered complete will be assigned to an auditor to begin the verification process.
  - 4.2.3 Failure to provide a complete application with supporting information may result in closure of the application.
  - 4.2.4 Should it be determined that the recycler has provided false information or misrepresented any part of the organization, recycling operations or processes undertaken, the application will immediately be rejected and the verification process terminated. Depending on the nature of the false information or misrepresentation, RQO reserves the right to deem the applicant non-eligible for the ERS program and deny reapplication.
  - 4.2.5 Organizational reputation, previous convictions and historical activities and interactions will be



---

considered a determining factor in all applications and eligibility for the ERS program.

\*\*\*\*\* Provincial Programs may have specific requirements that apply to service providers beyond those of this standard.

## Appendix 6 - Recycler Qualification Process, Reuse & Refurbishing Program



# **ELECTRONICS REUSE AND REFURBISHING STANDARD (ERRS) AUG 2025**

## PART A ELECTRONICS REUSE AND REFURBISHING STANDARD (ERRS)

### 1.0 General Requirements

R2 or eStewards certification to the appropriate scope reflecting the scope of the organizations activities is a prerequisite for RQO approval under ERRS 2025.

Reuse organizations shall operate in accordance with all applicable legal and other requirements. At a minimum, the organization shall:

- 1.1. Demonstrate Active reuse activity within the facility through established and sustainable processes certified under R2 or eStewards.
- 1.2. Maintain policies and practices to prohibit the use of child, prison or forced labour.
- 1.3. Maintain a current summary of applicable requirements, and suitable evidence of compliance with each.
- 1.4. Possess adequate workers' compensation coverage.
- 1.5. Possess Comprehensive or Commercial General Liability insurance coverage of no less than \$2 000 000.
- 1.6. Maintain a documented procedure to provide notice of reportable incidents within 5 business days including: changes in name or ownership; fines or regulatory orders; spills; fires; or reportable injuries or changes in R2 or eSteward Certification status.
- 1.7. Maintain closure plan financial assurance, based on the maximum material capacity as follows:
  - 1.7.1. Maximum capacity less than 50 MT = \$25k minimum;
  - 1.7.2. Maximum capacity of 50 to 149 MT = \$75k minimum;
  - 1.7.3. Maximum capacity of 150 to 499 MT = \$100k minimum;
  - 1.7.4. Maximum capacity of 500 MT or greater = \$125k minimum; or
  - 1.7.5. Where the facility is owned by the Organization, provide an approved Commitment and Waiver Letter accepting full responsibility and liability to cover all costs in the event of a closure.
- 1.8. Maintain a complete Risk Assessment and evidence of compliance with all applicable laws and regulations
- 1.9. Approval from appropriate provincial program.
- 1.10. Reuse activities are identified in R2 / e-stewards scope of approval
- 1.11. Process all EPRA material in accordance with the RQO defined scope of approval and downstream flow.

### 2.0 Safety and Environmental Controls

Reuse organizations shall maintain and adhere to a documented Environmental Health and Safety Management System including but not limited to the following:

---

- 2.1. Define the responsibilities and qualifications for individuals conducting the risk assessment.
- 2.2. Record any potential physical, chemical and ergonomic hazards associated with the materials handled and tasks undertaken.
- 2.3. Maintain a process to evaluate risks, develop control measures, and monitor effectiveness.
- 2.4. Maintain a schedule to conduct subsequent risk assessments at least annually.
- 2.5. Provide training and written instruction for the proper handling, storage and disposition of all materials.
- 2.6. Provide training and written instruction for responding to accidents, emergencies and releases.

### **3.0 Electronics and Information Security**

Reuse organizations shall develop and maintain effective security controls to protect all electronic products, components (e.g. disk drives, data cards), and user data contained on either, from theft, unauthorized access, or other unintended use. The organization shall at a minimum:

- 3.1. Store all products in a secured, indoor environment, and prevent unauthorized access to the premises and storage areas.
- 3.2. Provide training and written instruction on the processes used to destroy all user data as well as verify the destruction of the data.
- 3.3. Remove any sources of donor identification such as asset tags.
- 3.4. Ensure and document physical destruction of any items where data destruction cannot be confirmed through an RQO approved Downstream.

### **4.0 Process Management**

Reuse organizations shall maintain documented procedures for processing all products, to:

- 4.1. Ensure that all parts and components used in the refurbishing processes are system compatible.
- 4.2. Ensure that all software and firmware are properly licensed.
- 4.3. Test all products and verify proper functioning prior to remarketing.
- 4.4. Ensure remarketed items are adequately packaged to protect from damage during transport.
- 4.5. Provide a minimum 30 day warranty for the repair or replacement of all remarketed product, excluding consumable items such as batteries, toners, fusers, etc.
- 4.6. Ensure end-of-life products and components are processed through an RQO approved recycler.
- 4.7. Track and record the types and quantities of products received, remarketed, and sent for end-of-life processing.

---

## 5.0 Site Closure Plan

Reuse organizations shall prepare a documented site closure plan in the event of a sale, closure, abandonment, bankruptcy or other form of dissolution of the organization that, at a minimum:

- 5.1. Stipulates how all electronic products will be managed in accordance with the ERRS.
- 5.2. Provides an assessment of financial requirements upon closure and a mechanism for ensuring the availability of such funds,

## 6.0 Submission and Acceptance

- 6.1 The reuse organization is responsible for completing the ERRP Reuse/Refurbishing Application Form and submitting it to the RQO along with associated supporting documentation.
- 6.2 The RQO will determine if the application is complete and sufficient supporting evidence of conformance has been provided to initiate the on-site operational audit.
  - 6.2.1 Incomplete applications will be rejected and the applicant notified.
  - 6.2.2 Applications considered complete will be assigned to an auditor to begin the audit process.
  - 6.2.3 Failure to provide a complete application with supporting information may result in closure of the application.
  - 6.2.4 Should it be determined that the recycler has provided false information or misrepresented any part of the organization, recycling operations or processes undertaken, the application will immediately be rejected and the audit process terminated. Depending on the nature of the false information or misrepresentation, RQO reserves the right to deem the applicant non-eligible for the ERRP and deny reapplication.
  - 6.2.5 Organizational reputation, previous convictions and historical activities and interactions will be considered a determining factor in all applications and eligibility for the ERRP.

\*\*\*\*\* Provincial Programs may have specific requirements that apply to service providers beyond those of this standard.

## Appendix 7 – List of Obligated Electronics Prior to January 1, 2026

- (i) a television,
- (ii) a desktop, laptop and notebook computer and the computer's central processing unit, keyboard, mouse and cable,
- (iii) a computer monitor,
- (iv) a computer desktop printer and a desktop printer with scanning or fax capabilities,
- (v) a desktop scanner,
- (vi) an audio and video playback and recording system,
- (vii) a telephone,
- (viii) a cellular phone and other wireless communication devices,
- (ix) a fax machine,
- (x) a personal digital assistant and other similar handheld devices not capable of connecting to the Internet,
- (xi) a digital camera, and
- (xii) an analog or digital video camera, and