



**AUTHORIZED DROP-OFF POINT  
APPROVAL PROGRAM (ADOPAP)**

V2019.09

The *Authorized Drop-Off Point Approval Program* (ADOPAP) developed by the Electronic Products Recycling Association of Québec (EPRA-Québec) defines the approval and verification processes as well as the minimum operational, environmental, safety, health and data protection requirements for organizations wanting to operate an authorized drop-off point.

The ADOPAP ensures that products covered by the Program are handled responsibly to adequately preserve the environment as well as workers' health and safety, and sets a framework for protecting data and products containing data from unauthorized access or use.

The ADOPAP does not supersede any regulatory requirements or exempt collection site operators from their responsibility to comply with regulatory obligations. Should a provision of the ADOPAP conflict with a regulatory requirement, the latter will prevail.

The ADOPAP may be revised or updated at EPRA-Québec's discretion to ensure that the products covered by the Program are properly handled and to prevent unauthorized access, theft, discharges in the environment as well as risks to health and safety.

The ADOPAP includes the following:

**PART A – TERMS AND DEFINITIONS:**

Glossary of the main terms used.

**PART B – AUTHORIZED DROP-OFF POINTS CODE (ADOPC):**

Defines the requirements authorized drop-off points (ADOP) must comply with in order to be recognized by EPRA-Québec.

**IMPLEMENTATION GUIDE:**

Provides ADOPs with complementary information and instructions regarding the application of the ADOPC, as well as examples of satisfactory proof of compliance with the ADOPC.

**PART C QUALIFICATION PROCESS:**

Defines the steps to follow in order to be recognized as an ADOP.

**PART D PROCESS FOR SITE VISITS:**

Defines the ADOP process for site visits, including follow-up of non-compliances.

**APPENDIX A – AUTHORIZED DROP-OFF POINT – INFORMATION SHEET**

**APPENDIX B – SITE VISIT REPORT – SAMPLE**

## PART A

### TERMS AND DEFINITIONS

|                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>EPRA</b>                                       | Electronic Products Recycling Association (national entity).                                                                                                                                                                                                                                                                                                                                                                     |
| <b>EPRA-Québec</b>                                | Electronic Products Recycling Association of Québec (provincial entity).                                                                                                                                                                                                                                                                                                                                                         |
| <b>Discharge</b>                                  | Accidental discharge into the environment.                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Implementation Guide</b>                       | Document intended for authorized drop-off points that sets out directives and additional details concerning the application of the ADOPC.                                                                                                                                                                                                                                                                                        |
| <b>Authorized Drop-Off Points Code</b>            | Document that defines the rules to follow as well as the minimum operational, environmental, safety, health and data protection requirements for organizations wanting to operate an authorized drop-off point in accordance with the <i>Québec Program for the Recovery and Reclamation of Electronic Products</i> .                                                                                                            |
| <b>Authorized drop-off point</b>                  | Location where citizens and/or industrial, commercial and institutional (ICI) businesses may drop off electronic products covered by the Program.                                                                                                                                                                                                                                                                                |
| <b>First responder</b>                            | Police officer, firefighter or ambulance personnel.                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Electronic product</b>                         | Electronic device or equipment that, by virtue of the Regulation respecting the recovery and reclamation of products by enterprises, is covered by the program implemented and managed by EPRA-Québec, including end-of-life electronics (see the complete list of covered electronics at <a href="https://www.recyclemyelectronics.ca/qc/what-can-i-recycle/">https://www.recyclemyelectronics.ca/qc/what-can-i-recycle/</a> ). |
| <b>Program</b>                                    | The <i>Québec Program for the Recovery and Reclamation of Electronic Products</i> mandated by the Regulation respecting the recovery and reclamation of products by enterprises that is implemented and managed by EPRA-Québec.                                                                                                                                                                                                  |
| <b>Authorized Drop-Off Point Approval Program</b> | Document that defines the minimum requirements as well as approval and site visit processes applicable to authorized drop-off points.                                                                                                                                                                                                                                                                                            |
| <b>Refurbishing</b>                               | Any dismantling of electronic products for the purpose of conducting internal tests or troubleshooting, replacing or repairing defective parts, except such consumable components as batteries, cartridges, fuser units, etc.                                                                                                                                                                                                    |
| <b>Reuse</b>                                      | Transfer of usable electronic products from one user to another so that the product may continue to be used for its original purpose without repair or change.                                                                                                                                                                                                                                                                   |
| <b>Regulation</b>                                 | Regulation respecting the recovery and reclamation of products by enterprises, CQLR, c. Q-2, r. 40.1, and all its amendments.                                                                                                                                                                                                                                                                                                    |
| <b>Collection site</b>                            | Location where EPRA-Québec or its designated representative collects electronic products.                                                                                                                                                                                                                                                                                                                                        |
| <b>Worker</b>                                     | Full-time, part-time or contract employee.                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>User</b>                                       | Member of the public or company employee who uses the services of an authorized drop-off point to leave their end-of-life electronics for the purpose of recycling or reuse.                                                                                                                                                                                                                                                     |

## PART B

### AUTHORIZED DROP-OFF POINTS CODE (ADOPC)

#### 1.0 GENERAL REQUIREMENTS

All authorized drop-off points (ADOP) must:

- 1.1. Be open to the public and accept covered electronic products (EP) at no charge.
- 1.2. Have valid permits and authorizations required to operate an ADOP within a given jurisdiction.
- 1.3. Be covered by commercial or comprehensive general liability insurance that includes protection against bodily injury and property damage as well as a rider for comprehensive business and contractual liability, with combined coverage of at least \$1 million per event and \$1 million civil liability.
- 1.4. Enforce a policy that deters employees from stealing collected electronics and specifies applicable penalties ranging from minimum measures to immediate firing in cases of theft or data security breach.

##### **Implementation:**

- 1.1. *Be open to the public and not apply restrictions on the user, such as collection fees for handling electronic products covered by the Program.*
- 1.2. *Hold a business or operating permit and/or waste handling registration or authorization.*
- 1.3. *Maintain a \$1 million civil responsibility insurance for pollution as well as commercial or comprehensive general liability insurance coverage.*
- 1.4. *Enforce a theft deterrence policy that:*
  - *Defines expectations regarding safe EP handling (receiving, sorting, warehousing and packaging) to prevent theft or access to data.*
  - *Spells out applicable consequences of policy violations.*
  - *Is properly communicated and understood by all employees.*

#### 2.0 REQUIREMENTS AUTHORIZED DROP-OFF POINTS (ADOPs) MUST MEET

All ADOPs must be adequately maintained to ensure safe user access and EP warehousing. They must also:

- 2.1. Provide the public with product receiving areas that are easily accessible, free of danger, uncluttered with mobile equipment and appropriately equipped to facilitate EP drop-off.
- 2.2. Ensure that sorting and/or warehousing areas are sheltered and access controlled.
- 2.3. Have in place appropriate security and control measures that prevent unauthorized access to the site, warehousing areas and EPs, even outside operating hours.

##### **Implementation:**

*Installations and operational controls must be adequately maintained.*

- 2.1. *Product receiving areas must be easily accessible to the public, free of danger, uncluttered with mobile equipment, and appropriately equipped to facilitate EP drop-off.*
- 2.2. *Sorting and warehousing areas must be enclosed so as to avoid exposure to bad weather and unauthorized access.*
- 2.3. *Appropriate security measures must be in place to prevent unauthorized access to the site, theft as well as removal of collected products or the data they may contain.*

### 3.0 MEASURES TO PROTECT THE ENVIRONMENT, HEALTH AND SAFETY

All ADOPs must have in place measures to protect the environment as well as health and safety to prevent accidents, injury and discharges into the environment. As a minimum, ADOPs must:

- 3.1. Ensure that EPs, particularly damaged products, are appropriately handled (receiving, sorting, warehousing and packaging).
- 3.2. Maintain documented procedures describing how EPRA-Québec must be notified in the event of regulatory decisions, penalties, data security breaches, product theft and other incidents, including those requiring the assistance of first responders (accidents or discharges).

### 4.0 TRAINING

At least once a year, all ADOPs must provide personnel with documented training on the following topics:

- 4.1. Identification of EPs covered by the Program.
- 4.2. Appropriate EP handling procedures (receiving, sorting, warehousing and packaging).
- 4.3. Measures to apply in order to ensure the integrity of collected EPs, including data security.
- 4.4. EP follow-up requirements, from receiving to shipping.
- 4.5. Safeguards to prevent covered EPs from being handed over to any party other than EPRA-Québec.

#### **Implementation:**

- 3.1. *Work directives or operational procedures or training regarding requirements applicable to EP receiving, sorting, warehousing and packaging must be provided to ADOP personnel.*
- 3.2. *Procedures that define the responsibilities of all parties involved and that specify relevant information and contact details to respond and report emergency situations and other incidents within 24 hours of the event. Personnel must be fully aware of these procedures.*

#### **Implementation:**

*Implement a training and evaluation program that defines qualification and training requirements and the frequency of subsequent refresher courses.*

*Maintain an appropriate log of completed training and personnel evaluations. Personnel must:*

- 4.1. *Be able to identify EPs covered by the Program.*
- 4.2. *Know how to handle EPs (sorting, warehousing, packaging).*
- 4.3. *Know the applicable measures to ensure data security (keep all collected EPs whole and intact).*
- 4.4. *Ensure that EPs are adequately processed, and processed separately from other types of products (e.g. metals, electrical products, other non-covered electronics).*
- 4.5. *Know the applicable measures to ensure that all covered EPs are handed over to EPRA-Québec (e.g. provide users with information).*

## **PART C**

### **QUALIFICATION PROCESS**

#### **5.0 ELIGIBILITY**

To be considered as an authorized drop-off point (ADOP), the organization must:

- 5.1. Not reuse, refurbish or manage, in any way whatsoever, any covered product outside EPRA-Québec's program.
- 5.2. Comply with the Authorized Drop-Off Points Code (ADOPC) minimum requirements and any other applicable regulatory requirement, and maintain documented evidence of such compliance.

#### **6.0 QUALIFICATION PROCESS**

The ADOP qualification process unfolds over three steps:

- 6.1. An organization wishing to obtain ADOP status must provide certain information to EPRA-Québec (see Appendix A: Authorized Drop-Off Point – Information Sheet).
- 6.2. EPRA-Québec will determine whether the organization qualifies for ADOP status.
- 6.3. Once all requirements have been met, EPRA-Québec may, at its discretion, establish a service agreement with the organization to which it has granted ADOP status.

## PART D

### PROCESS FOR SITE VISITS

#### 7.0 SITE VISIT OBJECTIVES

- 7.1. The purpose of the site visit is to verify whether the authorized drop-off point (ADOP) and its operations meet the requirements of the Authorized Drop-Off Points Code (ADOPC).
- 7.2. The site visit consists in an examination and verification of material evidence that may include, but is not limited to, policies, procedures, work directives, shipping logs, training files, permits, certificates, personnel interviews, and general observations.

#### 8.0 SITE VISIT

- 8.1. EPRA-Québec may, at its discretion, carry out site visits to confirm that a recognized ADOP continues to operate in compliance with the EPRA-Québec's requirements. Site visits may include, but are not limited to, an examination of the site, documents and/or logs.
- 8.2. Non-compliance with the requirements of EPRA-Québec's program or the ADOPC will result in the revocation of "authorized drop-off point" status.

#### 9.0 COMMUNICATION OF RESULTS

- 9.1. The EPRA-Québec representative will document all results, opportunities for improvement and non-compliances revealed by the site visit by filling out a site visit report for the ADOP, and will submit a copy of the final report to the ADOP (see Appendix B: Site Visit Report – Sample).

#### 10.0 CLASSIFICATION OF SITE VISIT RESULTS

Report items noted during the site visit will be classified as follows:

- 10.1. **Opportunity for improvement** – The report item does not present a risk for the environment, worker safety or data security, and does not violate a provision of the ADOPC currently in effect, but could constitute an opportunity for improvement.
- 10.2. **Non-compliance** – Operations that do not comply with one or more of the provisions of the ADOPC currently in effect, with a regulatory requirement, or with procedures and programs established by the organization.

#### 11.0 CORRECTIVE MEASURES PLAN

- 11.1. While opportunities for improvement do not require the application of an official follow-up procedure, they will be reviewed as part of a subsequent site visit.
- 11.2. An action plan to remedy non-compliance issues must be submitted to the EPRA-Québec representative within 15 days of receiving the final report.
  - 11.2.1. All non-compliance issues must be satisfactorily resolved within a reasonable timeframe (appropriate with regard to the non-compliance issue) in order to avoid their recurrence.
  - 11.2.2. An ADOP's failure to satisfactorily resolve a non-compliance within a reasonable timeframe will result in the revocation of its "authorized drop-off point" status.

## APPENDIX A

### AUTHORIZED DROP-OFF POINT – INFORMATION SHEET

#### GENERAL INFORMATION

- 1 Applicant's full name  
(municipality/company): \_\_\_\_\_
- 2 Full address: \_\_\_\_\_
- 3 Name of signing authority: \_\_\_\_\_
- 4 Title of signing authority: \_\_\_\_\_
- 5 Email of signing authority: \_\_\_\_\_
- 6 Name, contact details and  
business hours/period covered  
by the agreement:  
Internal use: Appendix B section E
- | Name/address/telephone of<br>each drop-off point | Business hours/period of each<br>drop-off point |
|--------------------------------------------------|-------------------------------------------------|
|                                                  |                                                 |
- 7 Target clientele:  
Internal use: Appendix B section D
- ☐ Residents

AND/OR

☐ ICI (industrial, commercial, and  
institutional businesses)
- 8 Electronics to be palletized by the  
applicant's personnel before being  
handed over to EPRA-Québec:  
Internal use: Appendix B section C
- ☐ Yes

OR

☐ No
- 9a) Storage capacity:  
Internal use: Appendix B section F&G
- Number of pallets \_\_\_\_\_

OR

☐ 24 pallets\*    OR    ☐ 48 pallets\*
- 9b) \*If storing 24 pallets or more,  
loading of electronics is  
carried out by:  
Internal use: Appendix B section H
- ☐ Applicant

OR

☐ EPRA-Québec
- 10 Storage space type:  
Internal use: Appendix B section B
- ☐ Municipal garage

OR

☐ Fabric shelter (megadome)
- ☐ Ocean container owned by the site
- ☐ Other: \_\_\_\_\_

### COORDINATING PICKUPS – CONTACT PERSON

- 11 Name: \_\_\_\_\_
- 12 Title or function: \_\_\_\_\_
- 13 Telephone: \_\_\_\_\_
- 14 Email: \_\_\_\_\_

### BILLING – CONTACT PERSON

- 15 Name: \_\_\_\_\_
- 16 Title or function: \_\_\_\_\_
- 17 Telephone: \_\_\_\_\_
- 18 Email: \_\_\_\_\_
- 19 GST number: \_\_\_\_\_
- 20 QST number: \_\_\_\_\_
- 21 Direct deposit: ☐ YES OR ☐ NO

Rapport de visite de site

Numéro : 5555-5

Site : Exemple  
196, rue XYZ  
Drummondville J2C 1T9

Personne(s) rencontrée(s) :  
ABC

Date de la visite de site :

Représentant(e) de l'ARPE-Québec :

Conclusion de la visite de site :

2026/01/15

Numéro de référence interne : 1234

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## Non-conformité

Numéro : 5432

Numéro de l'exigence du PAPDO : 4.1

Numéro du rapport de visite de site : 5555-5

Description de l'exigence :

Situation observée :

### Sections à remplir par le point de dépôt (PDO)

Mesure(s) corrective(s) : (Le PDO doit décrire les actions à prendre afin de corriger la situation actuelle) Échéance :  
(aaaa-mm-jj)

Plan d'action : (Le PDO doit décrire les actions à prendre afin de prévenir que ce problème se reproduise) Échéance :  
(aaaa-mm-jj)

### Section réservée à l'ARPE-Québec

Suivi :

Complété : ☐

Date de suivi :  
(aaaa-mm-jj)

2026/01/15

Numéro de référence interne : 1234

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