



EPRA BC EPR Plan

Submitted to: BC Ministry of Environment and Parks
Extended Producer Responsibility Section
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Victoria, BC V8W 9M1

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List of Abbreviations

C2R	Call to Recycle
CWMA	Coast Waste Management Association
EOLE	End of Life Electronics
EPR	Extended Producer Responsibility
EPRA	Electronic Products Recycling Association
EPSC	Electronics Product Stewardship Canada
ERS	Electronics Recycling Standard
ICI	Industrial, Commercial & Institutional
LAC	Local Advisory Committee
MEP	Ministry of Environment & Parks
NGO	Non-Government Organization
RCBC	Recycling Council of British Columbia
RCC	Retail Council of Canada
SABC	Stewardship Agencies of B.C

1. Introduction

Electronic Products Recycling Association (EPRA) is pleased to submit our Extended Producer Responsibility (EPR) Plan to the British Columbia Ministry of Environment & Parks, pursuant to the requirements of the British Columbia (BC) Recycling Regulation (“Regulation”) under the *Environmental Management Act* which sets out the requirements for extended producer responsibility, including the requirement for EPR plans. This EPR Plan replaces the current EPRA BC Product Stewardship Plan approved by the Ministry on September 27, 2024.

2. Duty of Producer

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

3. Appointment of EPR Agency

Sections 2 of the Recycling Regulation provides:

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

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

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

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

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

The EPRA Board of Directors effective December 31, 2025, is as follows:

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

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

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

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

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

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

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

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

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

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

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

4. Program Products

Section 4 of the Recycling Regulation provides:

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

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

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

In, 2027, BC will obligate a wider range of electronic and battery powered devices. EPRA plans to incorporate a broad range of those products including, but not limited to e-cigarettes and vapes, wearable electronics, uninterruptable power supplies, battery chargers, cables, power bars and extension cords, etc.

Newly added devices under the electronic and electrical product category will be effective as of August 1, 2027, and October 1, 2027, for devices under the battery-containing product category.

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

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

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

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

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

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

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

5. Stakeholder Consultation

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

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

During 2026, EPRA undertook a consultation process that provided meaningful opportunities for public consultation and comment. An overview of that process is included in Appendix B below.

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

EPRA is currently planning to include vapes/e-cigarettes in our program when they become obligated in October of 2027. For consultation purposes, a link to our current plan for vapes is available at this link:

<https://recyclemyelectronics.ca/bc/program-plan-consultation>

6. Collection System and Consumer Accessibility

Section 5(1) of the Recycling Regulation provides:

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

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

In 2025 EPRA BC's network expanded to 338 collection sites providing convenient access throughout the province. This includes approximately 77 Return to Retail (R2R) locations across the province which further enhances consumer convenience. The number of collection sites has grown significantly since the time of filing of the last Program Plan particularly in non-urban locations.

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

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

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

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

The criteria are built around the concept of urban and non-urban areas. For urban coverage (defined as Census Metropolitan Area (CMA) by Statistics Canada) the Program has adopted a 30-minute drive time. For non-urban coverage, the Program has adopted a 45-minute drive time.

Collection sites used in this calculation will be shown on the depot locator on the EPRA website or reported in the Collection Event list reported annually to the province.

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

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

EPRA was a founding member and continues to work with the First Nations Recycling Initiative (FNRI) which is now an SABC program to facilitate the collection of EPR material in BC's First Nations communities.

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

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

<https://recyclemyelectronics.ca/bc/business-recycling-program>

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

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

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

In previous plans, EPRA has used alternatives to a recovery rate to track performance. Our products are durable goods with lifespans measured in years or decades. This coupled with the rapid changes in technology make recovery rate calculations difficult.

However, beginning with the calendar year of 2027, we will include reporting of a recovery rate. Our recovery rate model is designed to measure the percentage of material collected compared to the amount of material that is put on market within a given period. The key principle of the model is to provide as much accuracy as is practical given the constraints of a very large variety of durable goods

products with varying life expectancies. The model relies on supply and collection data and uses reasonable assumptions where exact information is not available, while applying a consistent methodology year over year.

7. Consumer Awareness

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

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

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

- EPRA provides signage to the network of drop-off locations.
- Promotional material is made available for electronic product retailers to order and display. Examples of these can be found at:

<https://recyclemyelectronics.ca/ordering>

- Media campaigns are utilized to convey information about the Program. Examples of the primary components of the campaign are radio, print and online advertisements. Research is conducted periodically to confirm that campaign messages resonate with residents to motivate them to e-recycle. In our most recent campaign, the vast majority of respondents felt that responsible recycling of electronics was important in helping to pay it forward environmentally. The current EPRA brand campaign centers around the theme “Bring it.” This campaign is a call to action focusing on encouraging the consumer to recycle their devices. On the advertisements there is a link to the website URL so that residents can find out what and where to recycle.
- Since 2012 EPRA has conducted regular, extensive, consumer research to determine attitudes, motivators and habits. This research is used to enhance consumer awareness programs. This public opinion polling will be conducted at least every other year to determine awareness of electronics recycling in the province. This information will be outlined in EPRA’s Annual Report.

This polling is conducted by an independent third-party organization experienced in these types of surveys and participants will provide a representative sample of population and region within the province.

- In addition to consumer awareness levels, consumer research can provide additional insights on whether awareness is higher for certain product categories. The information provided through this measure helps identify opportunities for targeted campaigns to address lack of awareness for specific product categories. The Program will continue to conduct surveys that measure awareness of product categories in addition to the Program's overall consumer awareness level. Using the results from these surveys EPRA will:
 - Identify opportunities to raise awareness in product categories with lower-than-average awareness.
 - Develop awareness campaigns and strategies to target these product categories.
- The EPRA British Columbia website is continually updated to reflect any changes to the program. It will continue to clearly outline all of the materials acceptable for recycling as well as offer a prominently displayed collection depot locator with all of the locations in the province.
- EPRA will continue to offer an online learning hub, geared to young Canadians and educators. The learning hub is promoted through the EPRA and Recycle My Electronics websites as well as at special collection events. Access here: <https://recyclemyelectronics.ca/bc/articles/education>
- EPRA provides free-of-charge videos on recycling that are available for viewing and downloading on the EPRA and Recycle My Electronics websites. Examples include: *This is EPRA*, a video that provides a clear explanation and illustration of EPRA's program, process and promise. <https://recyclemyelectronics.ca/bc/articles/videos/this-is-epra>
- The second video titled, *What is the EHF?* explains the fees in Canada. This video was developed to help consumers learn about the fees and to assist retail organizations in training their staff on how to answer questions from consumers about the fees. It can be viewed at: <http://www.recycleMYelectronics.ca/bc/stewards/what-is-the-ehf-a-training-video/>
- EPRA maintains and promotes open communication with its producers and stakeholders through a variety of services. EPRA offers a well-serviced, program specific and bilingual Steward Services call-centre. The toll-free helpline service accommodates inquiries from British Columbia residents and other stakeholders and will continue to be an important communication tool. All calls and email are answered by EPRA call center staff who are trained to answer British Columbia specific calls.
- EPRA is also currently working with other EPR organization members to support the RCBC hotline and the BCrecycles.ca website. These tools provide a single source for the public to get information about a wide range of items that can be recycled under the province's various EPR programs.

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

Collection Focus New Consumer/Resident ADV Campaign: Bring It!

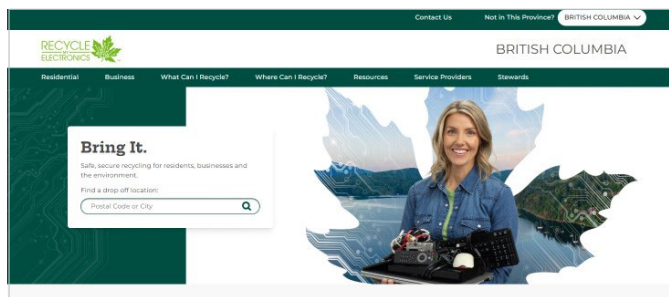


The new “**Bring it**” campaign rolled out for Earth month starting on April 1.

We see the full launch by Circular Economy month on October 1.

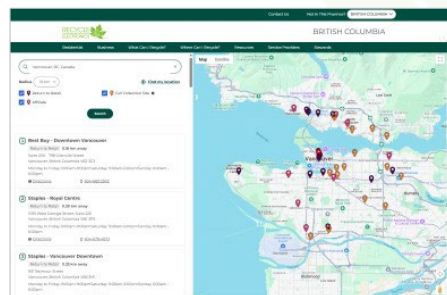
Extending the launch over the full year (2025), allows us to evolve the brand into a **focus on collection** but also maintain/hold program awareness levels.

Collection Focus Website + Map Locator Bring It!



EPRA map locator helps the public gain access to drop off locations in their area.

Traditional media and digital campaigns direct traffic back to the website to support promotion and education about the importance of recycling responsibly and the ease of recycling –which are key messages.



Visit:
recyclemyelectronics.ca/BC

Enter your postal code or town to find the drop off location closest to you.

Collection Focus New Consumer/Resident PR Campaign: Bring It!



2025 Spring Total Public Relations Interviews Report			
OUTLET NAME	MARKET/MEDIUM	TOTAL MEDIA	RUNS (instances)
Craig Wisehart: EPRA BC			
CBC Podcast: What On Earth with Laura Lynch - Your old phone could be a gold mine for the climate with Laura Lynch	British Columbia/Radio Podcast	1	1
Waste & Recycling: BC stewardship agencies join First Nations Recycling Initiative	British Columbia/Online Article	1	1
Total		2	2

Although most of our national Earth Month news coverage has been shifted, by media outlets, from April to May in lieu of election coverage, EPRA BC continues to boost positive engagement with local stories.

Impactful media relations deliver the Recycle My Electronics following messages:

- Residents:** The importance of safely recycling electronics.
- Businesses:** Customizable recycling solutions for business



EPRA Steward Support Always On Steward Support Point of Sale Materials



EPRA remains committed to keeping our stewards/stakeholders informed about any program/service changes and actions we're taking to support. EPRA continues to provide regular communication and regularly collects feedback.

- Bilingual Response Centre
- Webinars
- Company - News Newsletters
- REportALL Reporting
- Annual Steward Survey
- EPRA provides a series of communication updates via free point-of-sale materials (POS) – we offer brochures and tent or counter cards to Stewards.
- To order POS direct, visit:
recyclemyelectronics.ca/ordering/



8. Management of program costs

Section 5(1) of the Recycling Regulation provides:

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

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

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

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

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

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

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

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

Factors considered in the EPRA cost model include:

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

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

9. Management of Environmental Impacts

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

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

Reduce

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

Reuse

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

Recycle

Responsible recycling and processing of end-of-life electronics is the hallmark of EPRA BC's program. As outlined above, EPRA encourages reuse of working electronics prior to reaching end of life. Recycling, which diverts electronics waste from landfill and illegal export, is a major focus of this program. Typically, recycling involves some form of "primary" or initial processing, which may include dismantling and sorting of material by hand or by more elaborate mechanical means. Further manual or mechanical separation of materials by another vendor or vendors is considered "downstream" processing. Both primary and downstream recyclers are audited and approved in accordance with the Electronics Recycling Standard (ERS) to ensure that materials are managed in a safe, secure and environmentally sound manner.

To ensure that all materials collected under the program are responsibly recycled, EPRA contractually requires all recyclers to meet and maintain the requirements of the Electronic Recycling Standard (ERS) and to have successfully completed the audit and approval process which may be updated from time to time in order to ensure they meet the ongoing needs of the programs. Additional information about the Recycler Qualification Process can be obtained at www.rqp.ca

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

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

For clarity, below is a breakdown in accordance with:

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

PPH Elements	EPRA's Metric
(a) <i>reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency;</i>	Regular reporting & EPRA encouragement on industry improvements in this area (see above under “reduce”)
(b) <i>redesign the product to improve reusability or recyclability;</i>	Not feasible - little to no manufacturing or R&D related to electronic devices in Canada Currently about 4% of manufacturing takes place in the US with the vast majority in Asia (China, Taiwan, S. Korea, Vietnam, etc.) Canadian offices of these producers have little or no influence in the design of electronics as Canada represents about 1% of the world market
(c) <i>eliminate or reduce the generation of unused portions of a product that is consumable;</i>	Not feasible – the only consumable for electronic devices is ink/toner cartridges which are not obligated other than those returned in obligated products. These are managed by the program
(d) <i>reuse the product;</i>	Promoted by program, work with not-for-profit entities in this space (see above under “reuse”)
(e) <i>recycle the product;</i>	Responsible, audited recycling to a global standard (see above under “recycle”)

(f) <i>recover material or energy from the product;</i>	• <i>Limited to problematic materials such as certain plastics, wood, ink/toner cartridges, etc.</i>
(g) <i>otherwise dispose of the waste from the product in compliance with the Act.</i>	• <i>Limited to materials with no recycling options, such as carpeting or foam off speakers, shredder fluff and floor sweepings</i>

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

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

10. Dispute Resolution

Section 5(1) of the Recycling Regulation provides:

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

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

11. Performance Monitoring and Reporting Commitments

Section 5(1) of the Recycling Regulation provides:

- *(a) the plan will achieve, or is capable of achieving within a reasonable time:*
 - (ii) any performance requirements or targets established by the director.*
 - (iii) any performance requirements or targets in the plan.*
- *(c) the plan adequately provides for (v) assessing the performance of the producer's extended producer responsibility program.*

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

Metrics	Performance Targets and Reporting Commitments	
Governance	Significant changes to the agency’s structure or governance	
Products sold and collected		
Amount of product sold (units)	Annually	
Amount of product collected (weight)	Annually *3 rd party non-financial assurance	
Amount of product collected by regional district	Annually	
Amount of product collected per capita by regional district and total for the province	Annually	
Provide qualitative reporting annually on the RER and RER target performance by chemistry	Battery Chemistry	RER Target
	Alkaline, Carbon Zinc, Zinc Air	75% - 95%
	Lithium	50% - 65%
	Nickel Cadmium (Ni-Cd)	65% - 80%
	Nickel Metal –Hydride (Ni-MH)	70% - 85%
	Lithium Ion (Li-Ion)	70% - 95%
	Small Sealed Lead Acid (SSLA)	70% - 95%
Recovery Rate	Annually	
Collection System and Accessibility		
Location and number of contracted collection sites, and changes in location and number from previous report	Annually *3 rd party non-financial assurance	
Number of contracted sites by RD	Annually	
Number and location of contracted collection events by RD	Annually	
Percent of population with access to a collection location	98% target Every other year. Report standard and methodology used	
Waste Audits		
The results of local government waste composition studies identified in kilogram (kg)	Annually as can be coordinated with other EPR agencies	

per capita of program material and the total amount batteries from each of the studies	
Consumer Awareness	
Percentage of population aware of where to take electronics for recycling	80% target Reported Annually (biennial survey) Methodology used, including survey question
Management of Program Costs	
Program costs per tonne of material collected	Annually
Financial statements	Annually 3 rd party audited
Management of Environmental Impacts	
Efforts to reduce environmental impacts throughout the product life cycle	Annually through link to Greening Electronics Series (GES) report which focuses on broad sustainability trends impacting industry-led product stewardship programs in Canada, North America and globally
Management of collected products to final disposition.	Report by Material type, Percentage of total tonnage, Processing methods, Level of pollution prevention hierarchy Annually *3 rd party non-financial assurance

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

APPENDIX A

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

Schedule 3

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

Electronic and Electrical Product Category

Definitions

1 In this Schedule:

"computer" includes a computer monitor and computer peripheral;

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

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

Electronic and electrical product category

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

(a) electronic or electrical information technology or telecommunication devices or equipment including,

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

(ii) copying equipment,

(iii) typewriters,

(iv) calculators,

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

(vi) other devices, equipment or media for collecting, storing, processing, presenting or communicating information, including, sounds and images;

(b) electronic or electrical audio visual and consumer equipment or media, including, televisions, radio sets, cameras, video recorders and projectors, audio players, recorders, headphones, microphones, amplifiers, equalizers,

speakers, musical instruments, and any other products or equipment for recording or reproducing sound or images, including sounds and images

(c) electronic or electrical appliances including,

- (i) floor or carpet care appliances,
- (ii) garment care appliances including, irons and mangles,
- (iii) appliances for counter top cooking, including toasters, toaster ovens, fryers, hot plates, microwave ovens, coffee makers, coffee grinders, kettles, blenders, mixers and food processors,
- (iv) knives,
- (v) devices for opening or sealing containers or packages,
- (vi) devices for measuring time,
- (vii) personal care appliances, including, hair cutting and drying appliances, tooth care appliances, shavers and massagers,
- (viii) scales,
- (ix) portable air treatment appliances, including, fans, air purifiers, humidifiers and air conditioners,
- (xvii) water purifiers, and
- (xviii) trash compactors and food waste disposal appliances;

(d) electronic or electrical tools, other than large-scale stationary industrial tools, including,

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

(f) electronic or electrical toys, including, trains, car racing sets, cars and trucks, including remote control and ride on toys, video games and video gaming equipment and consoles;

(g) sports equipment with electronic or electrical components, including the following:

- (i) biking, diving, running and rowing machines or computers;
- (ii) bicycles, unicycles, scooters and skateboards;

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

(i) electronic or electrical monitoring and control instruments, including, smoke detectors, alarm systems, heating regulators, thermostats and appliances for measuring, weighing or adjusting;

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

(k) electronic or electrical medical devices or equipment for detecting, preventing, monitoring, treating or alleviating illness, injury or disability, other than the following:

- (i) a medical device that has been implanted in a person
- (ii) a medical device that has been exposed to infectious matter;
- (iii) a medical device, or medical equipment, designed to be used exclusively in a health care facility;

(l) electronic or electrical decorations and signs designed for residential or business use, other than products whose installation requires the use of professional services;

(m) accessories, including cables, adapters, connection cords, extension power cords, power bars, chargers and printer cartridges, that could be used with electronic or electrical product listed in this subsection;

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

Battery-containing product category

5 (1) The battery-containing product category consists of the following products:

(a) products, including the following, that are designed primarily for residential, business or recreational use and that contain or require the use of one or more batteries weighing no more than 5 kg each:

- (i) clothing, footwear and hats and other wearable accessories;
- (ii) promotional and marketing products;

- (iii) party supplies;
- (iv) greeting cards;
- (v) food containers;
- (vi) locks and lockboxes;
- (vii) luggage and backpacks;
- (viii) jewelry;
- (ix) electronic cigarettes and vapes;
- (x) pet collars and pet feeders;

(b) batteries, including primary batteries and rechargeable batteries, weighing no more than 5 kg and that could be used in or with a product described in paragraph (a);

(c) portable battery-containing products, including the following, that are designed primarily to provide an external power source:

- (i) devices designed to start an engine;
- (ii) generators;
- (iii) power packs;
- (iv) power stations;
- (v) uninterruptable power supply products;

(d) batteries, including primary batteries and rechargeable batteries, that could be used in or with a product described in paragraph (c);

(e) accessories, including cables, adapters, connection cords, extension power cords, power bars and chargers, that could be used with a battery-containing product listed in this subsection.

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

For Item 2 The electronic and electrical product category does not include computers and televisions that are part of or attached to any of the following:

- (a) A motor vehicle;
- (b) A marine vessel;
- (c) commercial equipment that is not a product described in subsection (1)
- (d) industrial equipment that is not a product described in subsection (1)

Notes:

1. The Program does not include items weighing in excess of 200 kgs.
2. The Program does not include any medical device that has been implanted in a person or that has been exposed to infectious matter.
3. The Program does not include fixed installation electrical and/or mechanical devices. (i.e., a device that is wired directly into the structure, requires professional installation and/or cannot be readily removed without altering the electrical connections.)
4. The list of Product Definitions and Clarifications may be revised periodically by the Program.
5. While adhering to program principles, additional or expanded descriptions of eligible products and adjustment of program product categories may be necessary at the program's discretion as technology changes.
6. Products containing chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs), and/or any ozone-depleting substances are excluded from the EPRA BC program.

Appendix B: Stakeholder Consultations

To be added after consultation sessions