



End-of-Life Electronics Stewardship Program Prince Edward Island

Submitted to: **PEI Department of Environment, Water and Climate Change**
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Contact: Gerard MacLellan
Executive Director, Atlantic Canada
Electronic Products Recycling Association | Atlantic Canada
50 Eileen Stubbs Avenue | Unit 130 | Dartmouth, Nova Scotia B3B 0M7
e: gerard.maclellan@epra.ca



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1. Introduction

Electronic Products Recycling Association (EPRA) is pleased to submit this amended version of the approved End-of-Life Electronics (EOLE) Stewardship Program for Prince Edward Island.

EPRA is a not-for-profit association and is incorporated to deliver regulated programs in provinces across Canada. The electronics industry in Canada 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.

2. Program Summary

This document outlines revisions to the End-of-Life Electronic Stewardship Program Plan for Prince Edward Island. This plan sets out to meet the requirements of the Materials Stewardship and Recycling Regulations under the auspices of the Environmental Protection Act by diverting end-of-life and certain unwanted electronic products from disposal.

EPRA has operated a successful regulated electronics recycling program in Prince Edward Island since July 2010 and has collected over 5,000 metric tonnes of electronic waste via EPRA's twelve drop-off locations in the province.

Under this plan, regulated electronic products that are collected through the EPRA program in Prince Edward Island are not only diverted from landfill, but also prevented from illegal export. These two benefits are emphasized in the communications and public awareness strategy which aims to maximize participation in this stewardship program.

The End-of-Life Stewardship Plan for Prince Edward Island is based on a shared responsibility model where brand owners, retailers, consumers, and government all have a role to play in diverting products from landfill, recycling materials for reuse and protecting the environment.

Brand owners are responsible for providing the collection and recycling program that manages all electronics waste (e-waste) items identified in the province's Materials Stewardship and Recycling Regulations. "Brand owners" in the regulation refers to the brand manufacturer but also can refer to distributors and resellers or retailers. For the



purposes of being inclusive of all parties obligated, depending on how product may be put on market, the term "Stewards" will be referenced throughout this program document.

Brand owners/"stewards" are responsible for ensuring that an Environmental Handling Fee (EHF) is applied to new electronic items designated in the Regulations and remitting the funds to the program administrator. This remittance covers all aspects of the program, including collection, transportation, recycling, public awareness and administration. EPRA audits stewards for compliance with all aspects of the agreements and program requirements.

Parties purchasing electronics pay the designated EHF on these new electronics items at the point-of-purchase. Consumers and businesses are able to drop-off their e-waste items at a designated drop-off location without charge and with assurance that these items will be recycled responsibly. The Industrial, Commercial and Institutional (ICI) sector also have the option of scheduling drop-offs for large quantities of e-waste. Contracted recyclers for the program all meet the Electronics Recycling Standard (ERS).

The Government of Prince Edward Island (Department of Environment, Water and Climate Change) is responsible for enforcing the Regulations and ensuring full program compliance.

In March 2019, the Ministry Environment, Water and Climate Change announced an expansion to the Materials Stewardship and Recycling Regulations, adding six categories of devices, including external storage drives, electronic readers, video gaming equipment, GPS equipment, microwave ovens and larger floor standing printers or copiers to this list of obligated products. The EPRA program in Prince Edward integrated those devices into the program as of the obligation date of August 1, 2019.

An up-to-date listing of products addressed by this plan can be found at:
www.recycleMYelectronics.ca/pei

3. Program Principles

EPRA stewardship program in Prince Edward Island is:

- Consistent with industry's guiding principles for stewardship programs, which include promotion of the Electronics Recycling Standard (ERS) and harmonization with other jurisdictions where and to the extent possible;
- Open to all obligated stewards;
- Provides a level playing field that ensures fair competition;
- Achieves a high level of compliance and eliminate the potential for free-riders;
- Addresses the issue of orphan, historic, and imported products from companies without a provincial (Prince Edward Island) or Canadian presence;
- Ensures unwanted and end-of-life program materials are recycled in a responsible manner, meeting all occupational health, safety and audit provisions of the Electronics Recycling Standard (ERS).



- Ensures the program is delivered in an environmentally sound and economically efficient manner, and;
- Includes public transparency for financial and environmental reporting.

4. Management Structure of the Program

All activities associated with the program fall under the auspices of the EPRA Atlantic Canada Executive Director and management team, including the PEI Program Delivery Manager.

4.1 EPRA Atlantic Advisory Committee

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

4.2 Local Program Delivery Manager

EPRA has an established agreement with Island Waste Management Corporation to act as the Local Program Delivery Manager. This Agreement covers the following responsibilities:

- Establishing and maintaining a drop-off locations for the program in Prince Edward Island;
- Establishing and maintaining the infrastructure for transportation and consolidation of materials collected from the drop-off locations;
- Overall day-to-day management of the collection and transportation network on Prince Edward Island.

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

Whereas the Prince Edward Island program is expected to continue with no specified end date and the contract between the Local Program Delivery Manager and EPRA will have a specified end date, any decision to extend the contract or seek a Local Program Delivery Manager through a competitive bid process prior to contract expiration, shall be at the discretion of EPRA.

5. Program Details

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



5.1 Collection, Transportation and Consolidation

EPRA management working in concert with the Local Program Delivery Manager, will:

- Collect program materials in all areas of the province;
- Use a network of drop-off locations to provide adequate, appropriate, free and convenient drop-off service to the residential and ICI sectors. Twelve sites have been selected and their locations are outlined below.
- Transport the collected materials.

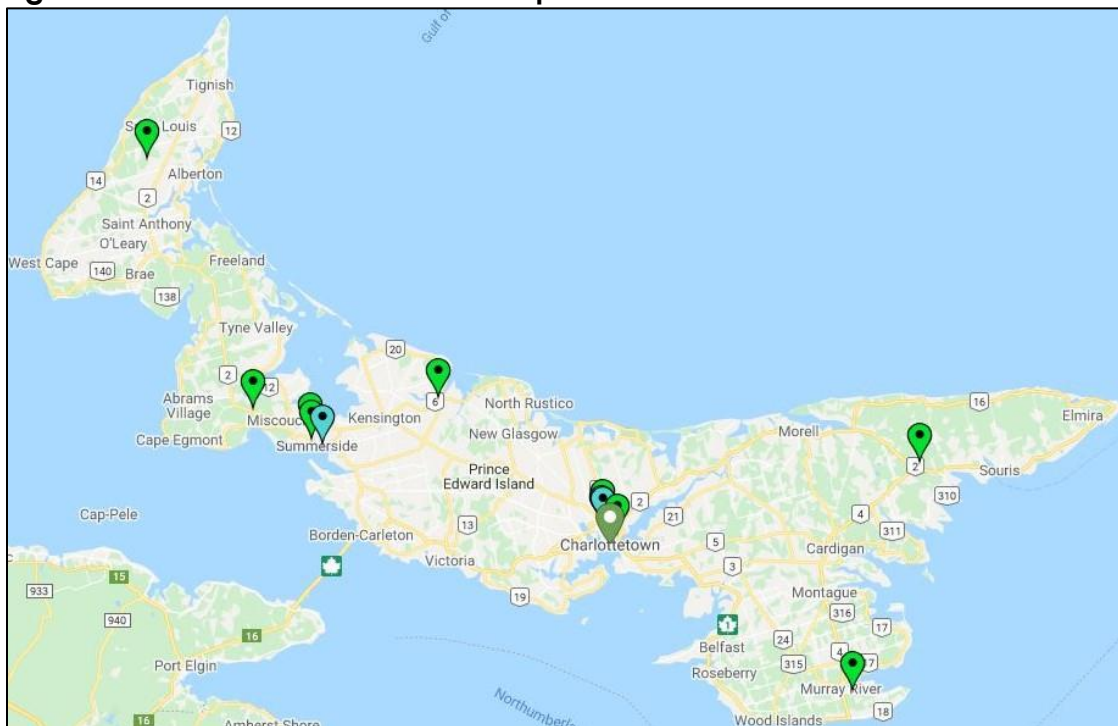
To ensure that the proposed network of drop-off locations are adequate, appropriate and convenient, EPRA has established the following criteria for service:

- Sites are strategically located to ensure that the majority of PEI residents are served.
- All drop-off locations shall be open a minimum of 30 hours per week, including four (4) hours on Saturday (except statutory or civic holidays) or as approved by EPRA.
- All drop-off locations shall have a sufficient floor space to accommodate the safe and efficient handling and storage of program materials accepted from the general public and ICI sector.
- Convenient accessibility of designated drop-off locations also accommodates scheduled deliveries of large quantities of program materials from the ICI sector.

Figure 1: EPRA Drop-off Locations in Prince Edward Island

	Location	Civic Address
1	IWMC, Brockton, West Prince	2202 Dock Road Route #150
2	New London, Central	10142 Route #6
3	EPWMF, Wellington Centre	29786 Route #2
4	GreenIsle, Charlottetown	7 Superior Crescent
5	IWMC, Dingwell Mills, North Kings	100 Selkirk Road, Route #309
6	IWMC, Murray River, South Kings	378 Cape Bear Road, Route #18
7	Aubrey's Bottle Exchange Ltd., Charlottetown	29 Garfield Street
8	GreenIsle, Summerside	175 Industrial Crescent
9	Don's Bottle Exchange, Summerside	601 Notre Dame Street
10	Staples Canada Inc., Charlottetown	655 University Avenue
11	Staples Canada Inc., Summerside	57 Water Street
12	Best Buy Canada, Charlottetown	191 Buchanan Drive

Figure 2: EPRA Collection Network Map



5.2 Monitoring of the EPRA Collection Network

The following is a description of the measures that will be implemented with respect to monitoring the EPRA collection network on Prince Edward Island.

The EPRA toll-free helpline is used as a primary tool to monitor public and steward feedback on both geographic/population coverage and customer service levels provided by EPRA drop-off network. All calls relating to these key elements are reviewed regularly by call-center staff and transferred to the Executive Director or Local Program Delivery Manager to be addressed or researched.

With respect to geographic/population coverage, EPRA will continue to conduct regular reviews to ensure the network meets the needs of Prince Edward Island residents. To ensure adherence to the criteria for service, a regular mapping exercise will be commissioned by EPRA, which will keep actual versus targeted reach measurements current and help identify any service gaps.

Data analysis will also assist in assessing the effectiveness of the existing collection network. Detailed information on volumes collected is recorded by operations staff and is reviewed periodically by the EPRA Executive Director, Atlantic Canada.

5.3 Options for Unwanted Electronics

Reduce: Electronics Product Stewardship Canada (EPSC) represents major electronics and IT equipment brand owners in Canada on sustainability issues. EPSC issues its *Design for Environment (DfE) Report* (the 2019 edition is now available here: https://epsc.ca/wp-content/uploads/EPSC_Report_2019_Web_Final.pdf), which highlights the industry's progress related to designing environmentally-conscious products, along with the many technological advances that are creating change in electronics design.

This edition of the DfE Report has a special focus on how electronics manufacturers in Canada and globally are working towards a future of zero h waste,—by reducing the use of plastic in packaging, improving closed-loop collection systems, improving recycling capacity, and incorporating post-consumer plastics into product design.

Figure 3: EPSC DfE Report 2019



The 2019 DfE Report highlights a number of examples leading electronics brand owners:

- A leading electronics manufacturer has begun to replace plastic packaging materials with paper and other more environmentally sustainable elements. From the first half of 2019, the packaging currently used for their products and accessories, such as mobile phones and tablets, will be substituted with environmentally sustainable materials like recycled or bio-based plastics and paper.
- Another electronics OEM is using an innovative bio-based packaging made from bamboo and sugarcane fiber. The material is 100 percent biodegradable, is lighter than previous packaging, and enables a reduction in overall packaging size. Aside from the obvious environmental benefits, this innovative design has resulted in efficiency improvements in transportation CO2 emissions.
- Yet another manufacturer has published goals are to ensure 100 percent of product packaging is sourced from sustainable materials and to ensure 100 percent of that packaging is either recyclable or compostable by 2020.

Reuse: Reusing unwanted electronic products has be promoted through the communications and public awareness program as the first option where markets and opportunities for reuse in-province exist. For residents on Prince Edward Island considering this option, caution should be exercised and particularly with respect to protection of personal information. EPRA will work with local charitable entities to understand the Electronics Reuse & Refurbishing Program (ERRP) and assist with their qualification. Obligated products that are used or refurbished will not attract an EHF.



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

Recycle: Recycling or processing of unwanted and end-of-life electronics will be promoted as the final option. 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. Material flows will be tracked to their “point of final processing”, i.e. where they are altered into a new product or state or, for unrecyclable hazardous materials, to their point of disposal, i.e., where they are disposed of in an environmentally sound manner.

5.4 Standards and Procedures for Recyclers of E-Waste

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

5.5 Incidental Municipal Collection

All incidental municipal collection is handled by Island Waste Management Corporation (IWMC) and they are contracted as the EPRA Local Program Delivery Manager for Prince Edward Island. All electronic waste regulated under the EPRA program will be handled by IWMC during the term of the agreement.

5.6 Voluntary Return to Retail Program

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

EPRA makes retailers aware of the program's benefits.



6. Program Funding:

6.1 The Environmental Handling Fee

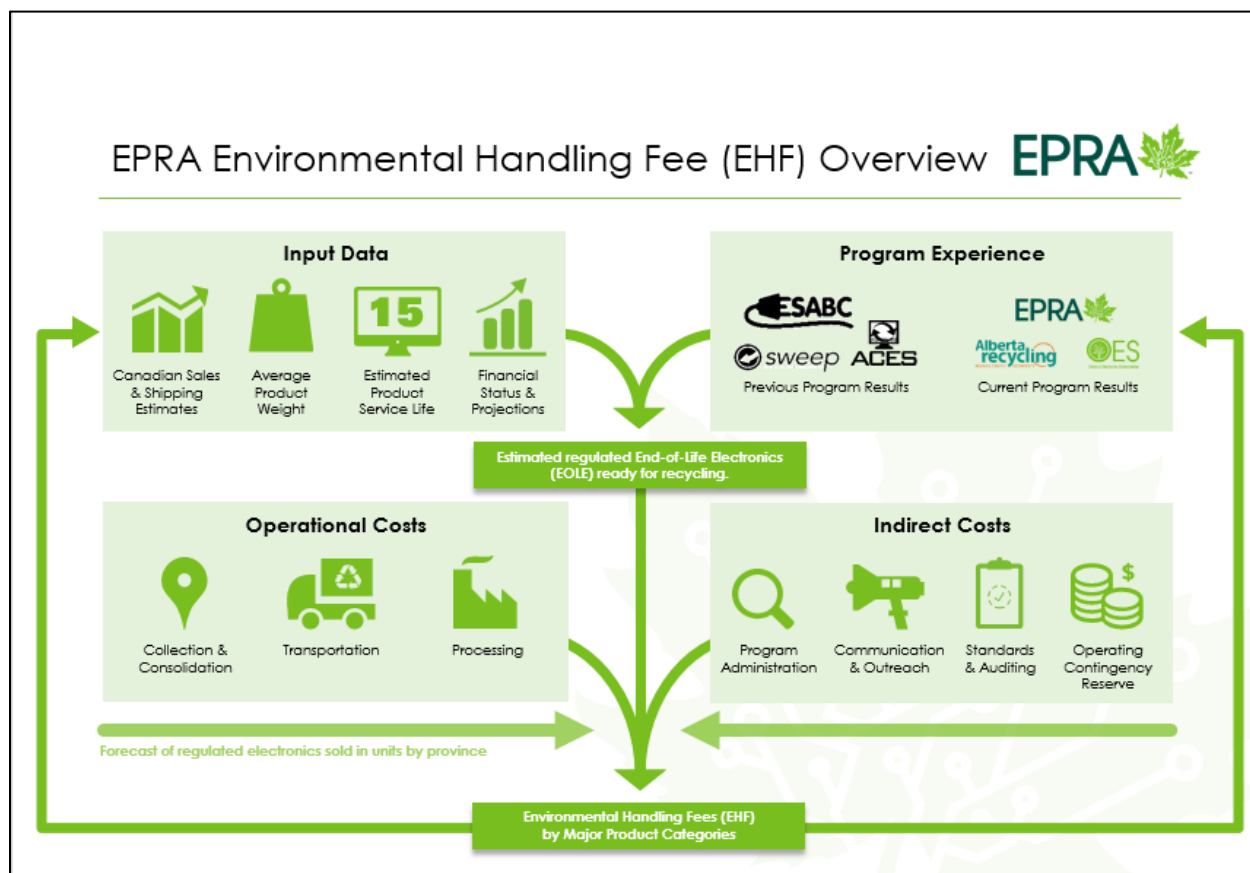
The program is funded by an Environmental Handling Fee (EHF) that is levied on new product sales designated by the Materials Stewardship and Recycling Regulations. The EHF allows consumers and the ICI sector to drop-off end-of-life electronic products to designated drop-off locations at no charge with the assurance that these items will be responsibly recycled. The ICI sector has the option of scheduling drop-offs for large quantities of e-waste.

The EHF for each product designated by regulation will reflect the true cost of managing that product. The EHF will fund:

- Collection, handling, consolidation, transportation and recycling;
- Communications;
- Public Awareness;
- Administration expenses;
- Environmental audit expenses; and
- Compliance and enforcement provisions in support of regulations and those required over and above government measures.

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

Figure 4: EPRA Environmental Handling Fee Overview



6.2 Setting the Environmental Handling Fee

Rather than a single flat fee set across all electronics products designated by the Materials Recycling Regulations, the fee is set by product category.

EPRA undertakes regular financial reporting to monitor revenue generated by the program and to ensure that funds are sufficient to fund all of the program activities identified in Section 6.1. The PEI program shall be audited annually by an independent external auditor.

6.3 Funding Flow

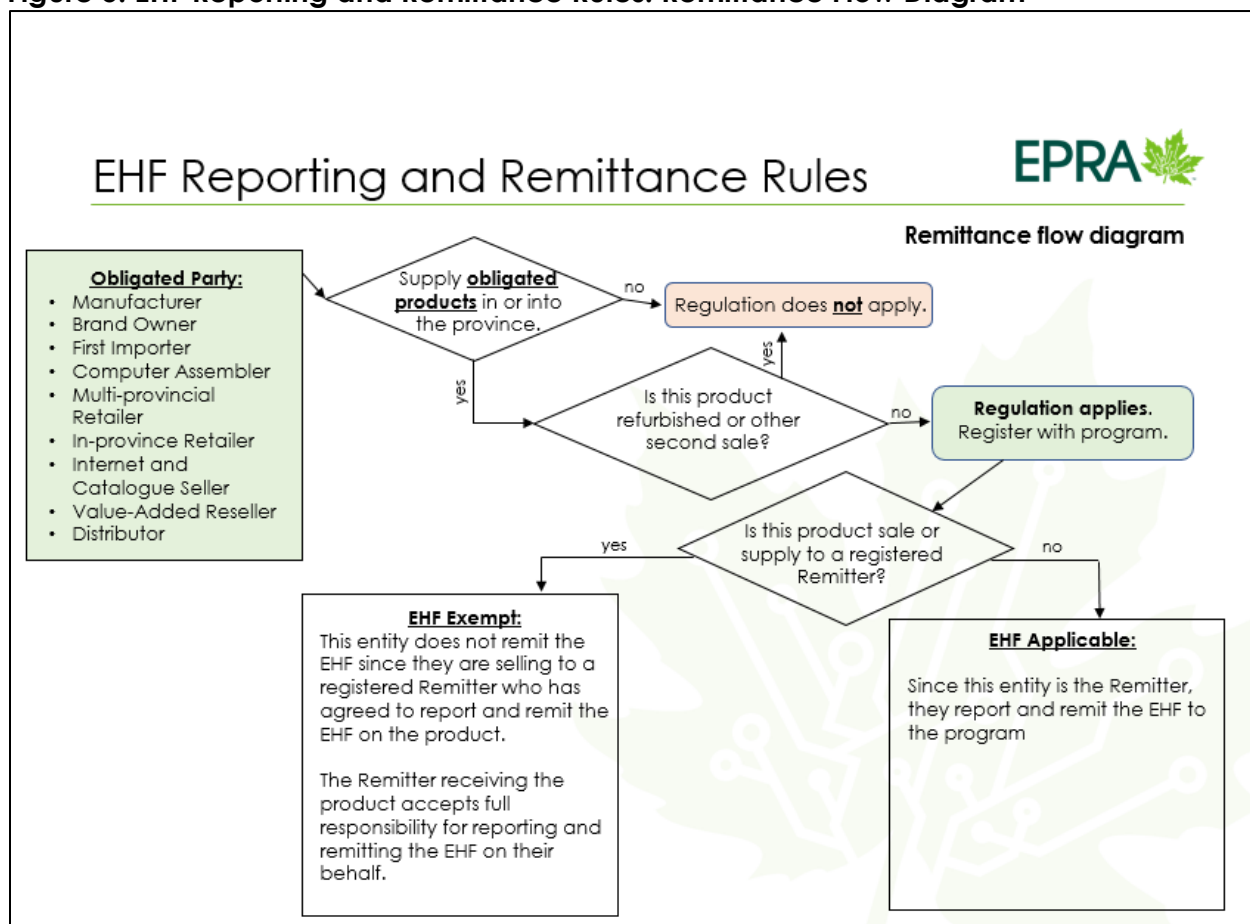
Obligated brand owners registered under the EPRA plan shall remit Environmental Handling Fees monthly to EPRA for their previous month's net sales (total sales less returns).

Due to complexities in the product supply chain and that electronics are sold through a variety of channels, each registered brand owner will be classified as either a "Remitter" or "Pay-on-Purchase" (POP) member. While a Remitter would usually be a

larger entity (e.g. manufacturer, national retailer or distributor), they can also be a small, province-based reseller or retailer. The POP classification was introduced to minimize the administrative burden of monthly reporting on these smaller, local resellers and retailers. However, these smaller, local businesses may choose to be either a Remitter or POP member.

This funding flow is outlined in Figure 5 and ownership of the program fund is retained by EPRA

Figure 5: EHF Reporting and Remittance Rules: Remittance Flow Diagram



7. Communication and Public Awareness

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



exported. EPRA/Recycle My Electronics is responsible for safe, secure recycling of electronics.

Recycle My Electronics is EPRA's award-winning, consumer-facing brand. Recycle My Electronics promotes the importance of recycling end-of-life electronics (EOLE), as well as the ease and accessibility of doing so. Recycle My Electronics communicates to national and local audiences the significance of e-waste recycling and the importance of recovering valuable resources in a safe, secure and environmentally sound manner. At the heart of the program messaging is the drive to continually invest in a shared future by ensuring that end-of-life electronics are safely and securely recycled. Recycle My Electronics' communication and public awareness activities maximize participation in this stewardship program.

In the last decade of operating in Prince Edward Island, EPRA/Recycle My Electronics in Prince Edward Island has experienced steady growth in consumer participation and engagement. Program awareness in Prince Edward Island is currently 87%. These awareness key performance indicators compare favourably to major brands.

EPRA/Recycle My Electronics attends to various stakeholder audiences, including public/consumers, brand owners and retailers of regulated products as well as government administrative divisions, agencies and departments.

EPRA/Recycle My Electronics works collaboratively with government agencies and departments to ensure the integrity of the provincial regulations are met. In 2019, following the announcement of the amendments to the Environmental Protection Act, EPRA/Recycle My Electronics worked closely with the Department of Environment, Water and Climate, Island Waste Management Corporation and other key stakeholders in Prince Edward Island to ensure program preparedness.

7.1 Communication Goals

- Maintain awareness (key performance indicator), as published annual in the EPRA Annual Report.
- Communicate to all audiences about the importance of recycling end-of-life electronics (EOLE) and recycling through the EPRA/Recycle My Electronics program. In particular, the ease of recycling and the products accepted in the province of Prince Edward Island.
- Provide EPRA drop-off locations in Prince Edward Island with communication materials that help consumers and business understand what and where to recycle end-of-life electronics.

- Ensure drop-off locations in being well informed regarding electronic products included in the Program and provide accurate information to customers.

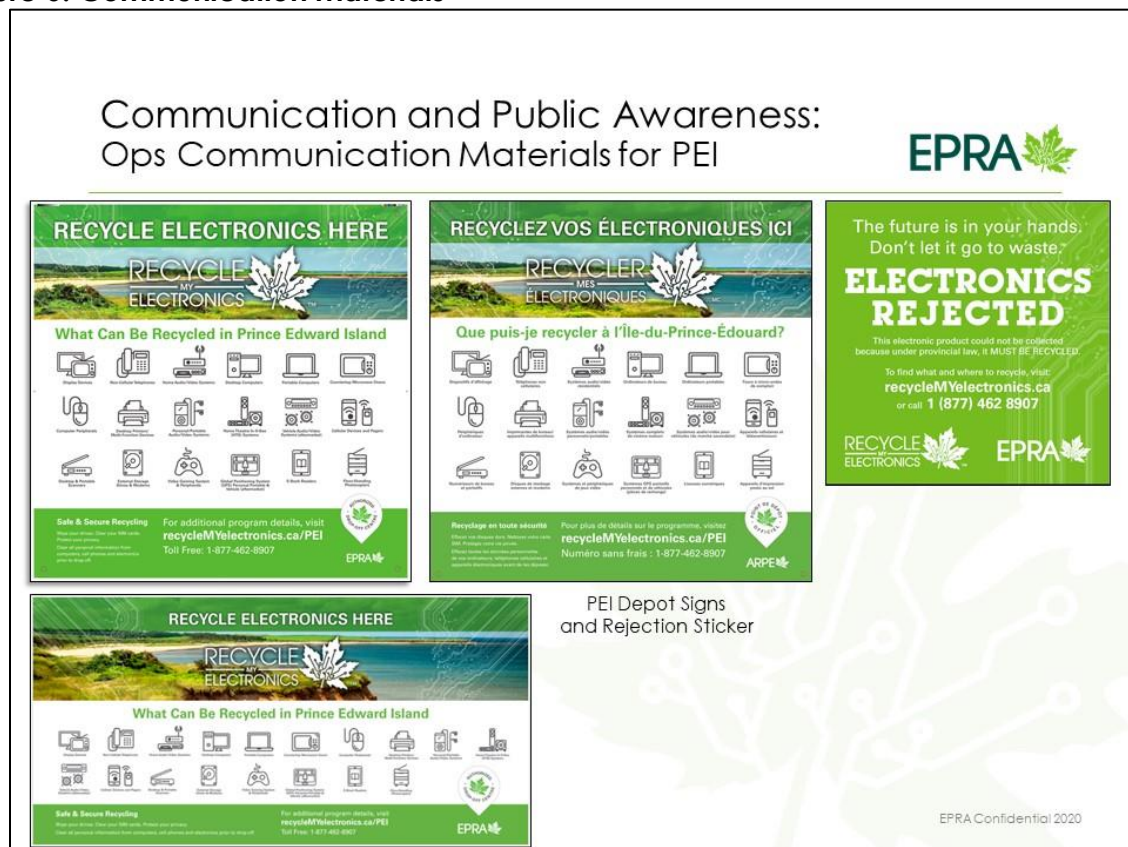
7.2 Communication Components

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

7.2(a) Integrated Campaigns. EPRA/Recycle My Electronics' integrated advertising campaigns take place during strategic campaign frames, such as Earth Week and Waste Reduction Week in Canada. During these timeframes, media interviews and a strong digital strategy will compliment ad-messaging and aim to keep EPRA/Recycle My Electronics top-of-mind and at the top of search rankings.

7.2(b) Ops Communications. EPRA/Recycle My Electronics continues to extend reach through the drop-off locations across the province. In 2019, EPRA/Recycle My Electronics outfitted authorized drop-off locations with new depot signs. As new drop-off locations are added and/or regulations are amended, EPRA/Recycle My Electronics will respond with updating communication materials for consumers, stewards, and drop-off locations.

Figure 6: Communication Materials



7.2(c): Extended Education. EPRA/Recycle My Electronics 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://www.recyclemyelectronics.ca/learning/>


EPRA/Recycle My Electronics has also developed videos on e-recycling that are available for viewing and download on our websites. The first video, titled “This is EPRA” provides a clear explanation and illustration of EPRA’s program, process and promise. This video is available on EPRA.ca and on the Recycle My Electronics website here: <https://www.recyclemyelectronics.ca/pei/resources/vision-mission-and-mandate/>


7.3 Stewards. EPRA maintains and promotes open communication with its stewards through a variety of services. To ensure stewards are kept up-to-date with their regional compliance and able to provide consumers with relevant information, EPRA also provides a series of communication updates via free point-of-sale materials, webinars, company newsletters, monthly product clarification updates and 3R Reporting. EPRA offers a well-serviced, program specific and bilingual Steward Services call-centre. An example of the free EHF brochure, can be found below and at the bottom of the provincial EHF page:

<https://www.recyclemyelectronics.ca/pei/residential/environmental-handling-fee-ehf/>


Figure 7: Steward and Point-of-Sale Materials

Communication and Public Awareness: Steward and Point-of-Sale Materials for PEI






PEI EHF Brochure



PEI EHF Tent card



PEI EHF Tent card

EPRA Confidential 2020



7.4. Responsive Communication Materials. EPRA will continue to seek feedback, to ensure stakeholders are receiving the communication and materials they require to do their part.

Steward and program awareness polling-will continue to be conducted on an annual basis to determine satisfaction in stewardship relations, and public perception and awareness of electronics recycling in the province. EPRA shares parts of this information in EPRA's Annual Report, available online at: <https://epra.ca/who-we-are/annual-report>

The EPRA/Recycle My Electronics toll-free, bilingual call-centre will continue to accommodate inquiries from residents and stakeholders of Prince Edward Island. The call-centre helpline will continue to be an important communication tool. All calls are answered by EPRA call-centre staff who have been trained to answer specific calls for the program/province.

8.0 Audit Systems

EPRA adopted and implemented audit standards and protocols to assist in ensuring that both its registered members and contracted recyclers achieve and maintain compliance with the EPRA program and governing regulation.

8.1 Auditing of Obligated Stewards

Criteria for Audits

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

Audit Procedures

Audits will follow established procedures and may involve a review of, but not limited to, the following records: sales records, purchase records, inventory counts and bank statements. All brand owners selected for audit will receive a letter detailing the time and place of audit and a request for records to review.

8.2 Auditing of Recyclers

EPRA requires that all primary recyclers and each of their respective downstream processors providing services to the program be first qualified through, the Electronics Recycling Standard (ERS) in order to receive and process program materials.

Where a processor changes its processing technology and/or downstream processors, they are also subject to re-audit to ensure any and all changes conform to the ERS.



8.3 Performance Measurements and Continuous Improvement

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

Indicator

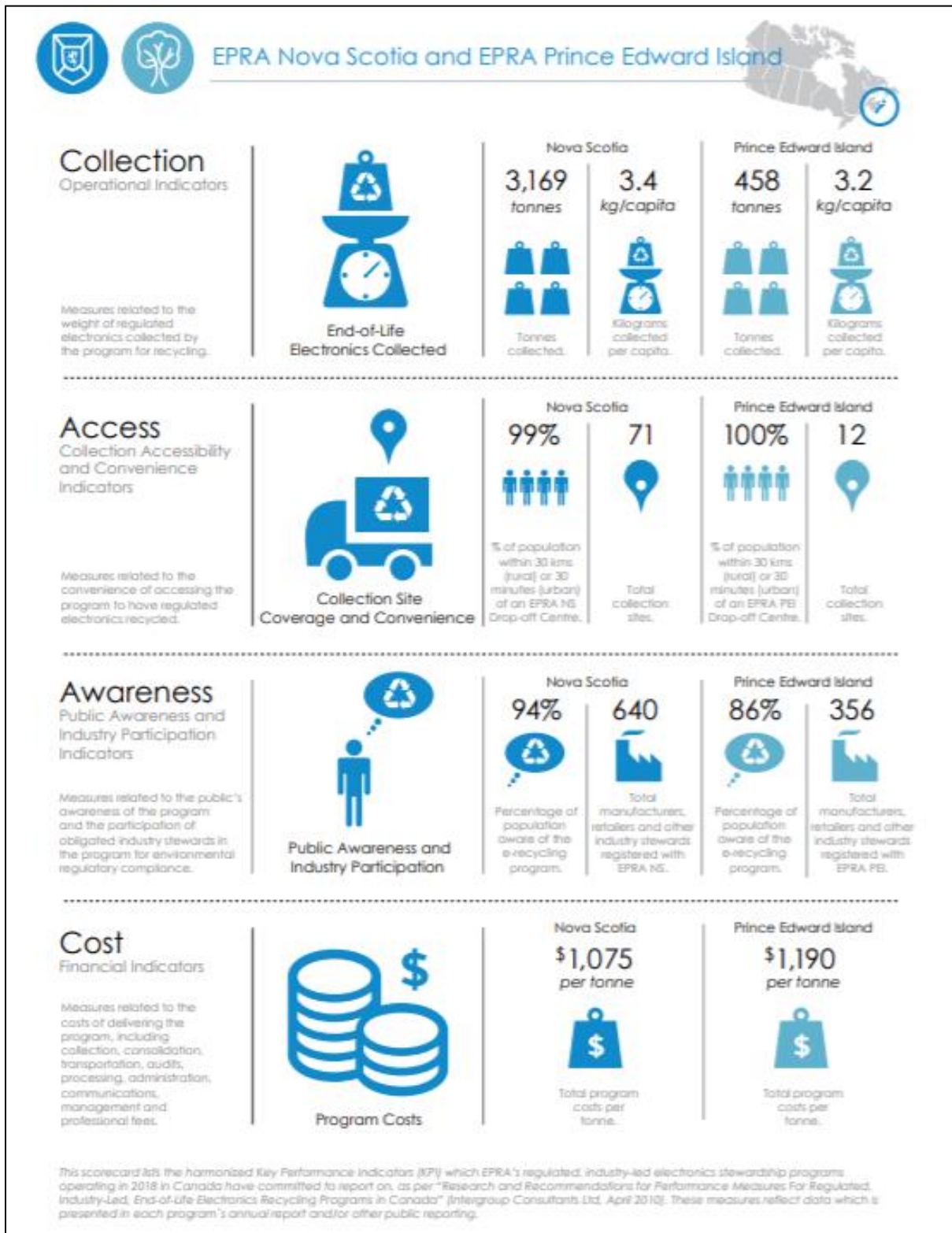
Operational	✓ Total WEEE Collected (tonnes) ✓ Total WEEE Collected per Capita (tonnes)
Financial	✓ Total Program Costs per Tonne
Accessibility	✓ Percent of Population Covered by Collection Sites ✓ Total Collection Sites
Awareness	✓ Percentage of Population Aware of the Program

With respect to program "Awareness" above, an evaluation of the communication and public awareness tools used may also be conducted to determine the strategy's effectiveness in getting the message out to the public. The program will be continuously monitored for opportunities to make improvements, both from an operational and strategic perspective.

Other issues to be reviewed on an ongoing basis include:

- The definition of obligated products to ensure the industry is current with changes in the marketplace and the end-of-life stream.
- Electronics waste management developments in other jurisdictions.

Figure 8: 2018 Performance of EPRA Nova Scotia & Prince Edward Island Programs





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