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1. EXECUTIVE SUMMARY

This stewardship plan has been developed in response to the amendment dated February 16, 2006, to the British Columbia Recycling Regulation of October 7, 2004 adding a schedule for electronics waste management. The schedule specifies that a stewardship plan is required to show how the electronics industry proposes to divert end-of-life computers, computer monitors, desktop printers and televisions from landfill through the promotion of reuse options and through collection, transportation, processing and subsequent recycling of products at end of life (EOL).

This plan was developed in collaboration with the electronics manufacturing and retail industries, local government representatives, non-profit and environmental groups, other stakeholders and the general public. This plan is also based on meeting the requirements of the Regulation, experience gained in other jurisdictions and a desire for harmonization with similar programs in other Canadian jurisdictions.

In addition, public consultations were held in 4 cities in the province, extensive solicitation of input from stakeholders was made via e-mail and written submissions were received until September 29th, 2006. A summary of comments from the public meetings and copies of the written submissions received are included in Appendix A. Feedback received from the consultation process has been incorporated, where applicable, in the stewardship plan.

The primary concern expressed at the meetings and in the written submissions is that existing organizations which collect and refurbish computers for community and charitable purposes be sustainable under this program. Responses to those concerns are detailed in this Summary and will show how the program will support the reuse of computers without compromising its ability to deal with the large amounts of waste electronic equipment anticipated to arrive at collection points.

Main Program Elements

Based on this collective input the program will be developed as follows:

Convenient Collection Systems

- Actual collection points and methods will be determined through a competitive process which will assess, among others, such matters as:
– proximity to population
– cost-effectiveness
– environmental health and safety
– ease of access
– facilities available

▪ Collection systems will be designed with user convenience and flexibility in mind.

▪ Major collection methods expected to be used include:

– A network of selected bottle depots which will provide permanent drop-off locations
– ‘Roving’ collection systems in remote areas where permanent facilities are difficult to sustain
– Municipal landfill sites and transfer stations where appropriate arrangements can be made
– Selected community-based recycling and re-use organizations
– A dedicated system of collection for large scale generators of end-of-life computers (e.g., municipalities)
– Special ‘round-up’ events at the launch of the program

Processing and Recycling

▪ Preliminary work to qualify processors under the Recycling Vendor Qualification Standards produced by Electronics Product Stewardship Canada (EPSC) has begun.

▪ The program will not ship any waste electronics to a processor that has not been qualified under the Recycling Vendor Qualification Standards (RVQS) requirements.

▪ Processors will be selected through a competitive process.

Public Awareness and Education

▪ The public awareness program will include all identified audiences with messages that, among other topics, will cover:

  – Identification of materials covered by the program
  – How to access the program – e.g. where to take materials
  – Where to get additional information
  – Promotion of re-use as the first consideration
  – Use of the environmental handling fee and disposition of recycled material
The primary focus of public awareness activities will be to ensure widespread knowledge of, and support for, the program throughout the province.

**Accountability and Transparency**

The program will be operated by Electronic Stewardship British Columbia, a not-for-profit entity, which, in accordance with the Regulation, will provide annual public reports outlining how it is performing and its plans for continuous improvement. Audited financial statements will show how the program is financed effectively and how fees collected have been directly applied to the costs of the program and are not used for any other purpose.

**Re-use of Electronic Products**

As noted above, the re-use option will be part of the public awareness program. In addition, the program will support re-use by:

- Working with existing re-use organizations to ensure that their charitable and community efforts continue
- Establishment of an industry Re-Use Committee to refine existing re-use programs and to explore new re-use initiatives
- Working with existing organizations to develop methods of assuring that re-use options are not exploited by collectors of waste electronics for illegal export
- Any re-use activities and organizations connected with the program will be assessed to ensure that all activities are compliant with program principles and that re-use is not used as a cover for activities incompatible with those principles

**Design for the Environment**

The electronics industry has undertaken major efforts in the material content, design and construction of its products to improve their environmental performance. In addition there have been a number of international design initiatives which many EPSC members have chosen to adopt on a world-wide basis. EPSC has produced a document (Appendix B) outlining progress being made by members of EPSC.
Financing Mechanism

The program will be financed by an environmental handling fee levied on the sale of new products in the designated categories. Commencement of fee collection will coincide with the launch of the collection program.

Public Consultation

During the public consultation process a number of concerns were voiced. The four main themes can be summarized as follows:

- The need to ensure that existing re-use and recycling operations, particularly those that are community based, can continue to operate
- The need for greater effort to be made to encourage and support the re-use option
- The need to address the data privacy issue on several levels including public awareness and the security of hardware in the program’s possession
- Desire to see the program expanded at the earliest opportunity to include all electronics

The plan’s responses to the concerns expressed have been included in the Program Elements section above. More detail regarding the public consultation process and input received is contained in Appendix A.

With the exception of the above, the public consultation process did not identify any major concerns with the stewardship plan. As the program is rolled out it will address legitimate re-use concerns but will focus on its main aim of reducing the larger quantities of electronic waste going to landfill or to environmentally unacceptable recycling programs either directly or in the guise of ‘re-use’ programs.

Program Phases – Target Dates

Phase 1: Plan development, public consultation and submission of the plan for approval by the British Columbia Ministry of the Environment.

With the submission of this Stewardship Plan to the Ministry of Environment on October 15th, 2006 Phase 1 is complete

Phase 2: October 2006 to May 31, 2007

Completion of all steps necessary for program launch including:
Establishment of Electronic Stewardship British Columbia as an industry-owned, not-for-profit corporation

Identification and assessment of collection points and systems including existing computer collectors

Establishment of the main cost elements of the program and the fees payable for services

Identification and assessment of existing computer re-use organizations

Identification and qualification of processors and recyclers

Development of educational and awareness programs

Identification and registration of obligated producers

Systems testing, cost analyses and adjustment

Phase 3 – June 1, 2007

Full program introduction for obligated products including:

Launch of public awareness programs

Full operation of province-wide collection, transportation and processing systems for designated EOL products

Commencement of environmental fees at point of purchase

Begin collecting data for annual reporting and verification of program results

Note: The June 1 date is a targeted implementation date for the program recognizing that the implementation date in the regulation is August 2007.

2. PROGRAM PRINCIPLES

A stewardship program will be introduced which will:

Be consistent with the Canadian Council of Ministers of the Environment Canada-Wide Principles for Electronics Product Stewardship (CCME Principles) including harmonization with other Canadian provinces. (www.ccme.ca/assets/pdf/eps_principles_e.pdf)
- Be consistent with British Columbia stewardship principles as defined in the Ministry of Environment Business Plan, the Recycling Regulation and the Recycling Regulation Guide

- Be consistent with industry developed (EPSC) guiding principles.

- Provide a level playing field and, in the longer term, provide the necessary research and development process to explore and define how environmentally responsible producers might be rewarded in the market place

- Achieve a high level of compliance and minimize the potential for free-riders

- Adequately address the issue of orphan, historic, and imported products from companies with no British Columbia operation or presence

- Ensure the program is delivered with the lowest possible cost while achieving maximum environmental efficiency

- Ensure materials are processed and recycled in a responsible manner that safeguards the environment and worker health & safety as well as preventing illegal export to developing countries

- Ensure the program reflects a shared responsibility model with appropriate roles for the provincial government, local government, consumers, industry, and other stakeholders

- Ensure the program provides adequate coverage to all areas of the province including rural areas

- Strive for continuous improvement in environmental and economic performance

3. **ORGANIZATION STRUCTURE AND MANAGEMENT**

EPSC will establish Electronic Stewardship British Columbia (ESBC), a not-for-profit corporation representing obligated producers which will oversee program development, management and operations. The corporation will be managed by a board of directors from producers obligated under the Regulation. Each producer will contract with ESBC to act as their agent as defined in the Regulation. Once ESBC is established, EPSC will request that all program responsibility be transferred to ESBC.
EPSC created an advisory council of British Columbia stakeholders including non-governmental organizations (NGO), local and provincial governments, and local representatives which will review the major plan components and provide ongoing advice and guidance. Referred to as the B. C. Electronics Advisory Committee, the activities of the committee will continue when ESBC is established and operating.

Encorp Pacific (Canada), will serve as the management and administration service provider to the ESBC program, and will contract with other service providers for public education and awareness, product collection, transportation, processing, recycling and auditing as required.

3.1 Management and Administration

Reporting to ESBC, Encorp Pacific (Canada) is responsible for the management and administration of the program including, but not limited to, the following tasks:

- Management of the public consultation process required for the stewardship plan
- Identification, registration, and auditing of obligated producers
- Collection and disbursement of fees through a process which ensures confidentiality of data
- Management of program communications
- Serve as an interface for the public and with parties contracted under the program
- Preparing the annual report
- Defining and meeting the performance management targets for the program including the plan for continuous improvement
- Overall day-to-day management of the program including liaison, in concert with ESBC, with B. C. Electronics Advisory Committee and other stakeholders, and the British Columbia government
- Management of contracts with the collection, processing and recycling service provider(s) and the audit functions
- Setting and adhering to operating budgets
All of the above activities undertaken by Encorp on behalf of ESBC are separate and distinct from Encorp’s duties as the product stewardship agency for non-alcohol beverage containers in British Columbia. There will be no cross-subsidy of operational costs between the beverage container program and the ESBC program.

4. PUBLIC EDUCATION AND AWARENESS

4.1 Objective

To ensure broad public knowledge and understanding of the province-wide recycling program for end-of-life (EOL) electronics.

4.2 Audiences

- All purchasers and current users of electronics including individual consumers, businesses, governments and institutions
- Retailers selling and/or taking back obligated electronic products
- Producers of obligated products including major brand owners, distributors, first importers and independent computer assemblers
- Collectors including depots, local governments, private contractors and community organizations which refurbish computers for re-use
- Processors including primary and all sub-stages
- Other stakeholder organizations including non-profits
- Schools, multi-lingual, multi-cultural and ethnic communities

4.3 Messages

- What specific products are included for recovery and recycling in the ESBC program
- Available options for the re-use of electronic products by charitable organizations and other individuals
- Collection points and systems for consumers, businesses and institutions
- Fee explanation including how much, who collects it and how it is used
• How the collection system will work in urban and rural areas and for persons with disabilities

• Handling requirements for collectors, processors and consumers including consumers’ responsibility for ensuring data privacy in end-of-life computers

• What happens to collected equipment and the material derived from them

4.4 Resources to be Employed to Deliver Key Messages

The key messages will be delivered to the public through a variety of methods designed to reach all of the identified audiences.

The program will include:

• A website which will include descriptions of programs, products, services, events and other relevant material and which will allow for direct e-mail contact

• Point of Purchase material and informational brochures

• Newsletters targeted to specific audiences

• Statistical reports and research into public awareness levels

• Selected use of traditional media, such as television, radio and newspapers when these provide the most effective method of reaching target audiences

• Ongoing outreach and dialogue with local governments including the provision of consumer education materials for inclusion in local government recycling programs

• Stewardship Plan made public

• Information for consumers to assist them in accessing data-wiping services and programs

4.5 Timelines

An initial 24 month program will be developed to cover pre-launch introduction, program launch activities and post-launch follow-up messaging. The plan will be continuously monitored and designed for
maximum flexibility to allow for adjustments to messages and delivery mechanisms as required.

4.6 EVALUATION

The program will periodically evaluate public awareness of the program and report on its results.
COLLECTION MATRIX

OBsolete AND UNUSEABLE COMPUTERS, TVS AND Printers FROM INDIVIDUALS, BUSINESSES AND ORGANISATIONS

PUBLIC EDUCATION AND AWARENESS PROGRAMS

MATERIAL NOT ENTERING THE PROGRAM e.g. TAPE PLAYERS APPLIANCES

PRODUCER OPERATED PROGRAMS WHERE MATERIAL WILL BE RECYCLED USING RECYCLERS CERTIFIED BY BCES OR EQUIVALENT

CHARITABLE AND OTHER REUSERS

UNUSEABLE EQUIPMENT

BUSINESS AND OTHER LARGE-SCALE DISPOSAL

CONSUMER DISPOSAL

Optional Collection Methods
- COMMUNITY ORGANISATIONS
- LOCAL GOVERNMENTS
- RETAILERS

DEPOTS

SPECIAL EVENTS

CONTRACTED TRANSPORTERS

CONSOLIDATION SITES (If Required)

PRIMARY RECYCLERS QUALIFIED BY ESBC

SUB-CONTRACTOR(S) QUALIFIED BY ESBC

RESIDUALS TO AUTHORIZED DISPOSAL

GLASS, FERROUS-, NON-FERROUS AND PRECIOUS METALS, PLASTICS

END MARKETS
5. COLLECTION, PROCESSING AND RECYCLING

Following the diversion of reusable electronic products to appropriate refurbishment and re-use channels, the remaining designated EOL electronics will be collected, processed and recycled through one or more contracts negotiated with service providers.

5.1 Collection

Collection of designated EOL electronics from consumers will be accomplished through a variety of mechanisms designed to meet the needs of consumers as well as operational requirements.

Selection of a specific collection point or system will depend on the needs of the identified market and each must meet minimum standards of cost-effectiveness and environmental health and safety. Selection of collection points will be through a competitive process assessing such factors, among others, as proximity to population, ease of access, costs of operation, ability to handle designated products, expertise, facilities, operational plans, etc.

The performance of each type of collection point or system will be regularly assessed to determine how each can be improved and adapted to changing conditions.

Collection points will include:

Depots – Utilizing the existing network of Bottle and Return-It Depots wherever feasible, consumers will be able to combine the return of designated EOL electronics with other reasons to visit the depot. The network of 170 existing depots will be assessed to determine which are physically capable of handling designated EOL electronics and can provide adequate coverage accessible to consumers in all parts of the province.

Existing Collection and Re-use Organizations – The program will evaluate existing re-use organizations to determine how their current operations can be accommodated within the collection system for EOL electronics while supporting their refurbishment and re-use functions. The key criteria will be to ensure that all collected material, whether destined for re-use or for scrap, is managed to the program’s quality control standards and that re-use programs are not used as cover for the collection of electronic waste for export or other improper handling.

Commercial and Institutional Users – These are the most likely sources for re-useable computers since systems are replaced well before final
obsolescence. These organizations will be targeted to ensure that they are familiar with the re-use options available. Where a large commercial user has determined that the equipment is at the end of its useable life, the program will direct these users to the appropriate depot, consolidation site or processor. Special collection procedures will be developed for large volumes such as those generated by governments and corporations.

Special Events – “Roundup” events will be scheduled where it is determined that a significant pool of designated EOL electronics may be available and/or where an organization wishes to partner with Encorp to promote an event.

“Roving” Collection Points – In rural a remote areas where permanent facilities may be difficult to sustain the prospect of scheduled collection events will be investigated.

Optional Collection Points:

Charitable and Environmental Groups – It is anticipated that some charitable collectors of donated items may wish to add obligated products to their collection programs. Environmental groups have organized collection programs for electronics in the past and may wish to continue to do so. In such cases Encorp will negotiate suitable terms and conditions for participation.

Local Government Waste Collection Facilities – Where feasible, where local government has willingly consented and compensation terms have been agreed, municipal and regional waste transfer and drop-off facilities may be used to collect designated EOL electronics. This will provide consumers with the convenience of being able to combine waste disposal activities into one trip.

Retailers – Where desired by retailers on a voluntary basis, and operationally feasible, consumers may be able to return designated EOL electronics to selected retail stores either on a scheduled event or continuous basis.

Collection sites will require materials handling equipment suitable for storage and movement of pallet loads of collected material.

The program will work to maximize the use of existing waste collection infrastructure in the province, provide potential opportunities for both public and private waste management collection, and facilitate healthy competition.
5.2 Processing and Recycling

Following collection at any of the above points, and dependent upon the quantity, designated EOL equipment will be moved to consolidation sites in selected areas of the province where transport-efficient loads of sorted material types will be assembled. Large consolidated loads may be moved directly from collection points to primary recyclers. Transportation to consolidation sites will be by trucks equipped with tail gates and pallet jacks. Consolidation sites will be capable of housing the equivalent of a trailer load of material.

Full loads of collected designated EOL material would then be transported to approved, processing and recycling contractors.

All processors and recyclers, and their sub-contractors, will be required to meet EPSC Recycling Vendor Qualification Standards to ensure that materials are processed in an environmentally sound manner with appropriate health, safety and export provisions.

The program will work to maximize local collection, transportation, processing and recycling of waste material wherever possible.

5.3 THIRD PARTY VERIFICATION

As part of the Recycling Vendor Qualification Standards an independent third party will be employed to review applications by recyclers and processors for compliance with the Standards and conduct audits prior to them receiving any designated materials. The independent third party will also conduct regular audits of approved recyclers to ensure continued compliance to the standards.

6. PERFORMANCE MEASURES

6.1 The Regulation

The Regulation calls for a 75% recovery rate or other rate that may be set by the Director. End of Life electronics pose a particular problem for meaningful measurements of program performance. This is for a number of reasons:

1) Diversion programs for this kind of waste are relatively new to North America – the oldest program is only two years old. The result is a lack of knowledge of behaviors surrounding return patterns and needs as well as the timing between purchase and return for recycling.
2) Although all obligated products are electronics, each product category has vastly different distribution, user patterns and average lifespan which can range from 5 to 20 years. Averaging sales over the last 5 or 10 years is not only difficult but also is not particularly relevant to all product types.

3) The size of the historic waste pile is unknown leading to a lack of knowledge of return rates and user behavior. It is also impossible to predict when the stock of historic waste will be cleared away and the program reaches a steady state for returns.

4) The supply chain for obligated products is extremely complex. Products are sold through a wide variety of distribution channels from direct sales to consumers, retail sales from out of province, and distribution through central warehouse facilities. Even when the program has been fully operational for several years it will be difficult to ensure complete reporting, and payment of fees, for all obligated products sold in B.C.

In the absence of reliable data on which to calculate such a recovery rate, and the difficulty of establishing a meaningful measurement, this plan does not propose a recovery rate at the outset.

The Regulation also requires re-submission of stewardship plans after five years and, by then, sufficient data and experience should have been gathered to allow the establishment of a valid statistical performance measure based on relevant data accumulated in the initial implementation of the program.

6.2 CONTINUOUS IMPROVEMENT

In the interim, as an indication that this is a leading program, ESBC will commit to two principles for performance measurement that are absent in all current North American programs:

1) It is assumed that the existing stockpile of historic waste is sufficient to ensure that the program will show increases in volumes of obligated materials collected in the first few years.

2) Improvements in this phase will concentrate on reducing the volumes of non-obligated material entering the system thus reducing the overall costs of the program.

In addition to the above ESBC will conduct two studies:
1) A world-wide study of the metrics used in EOL programs to determine those appropriate for this type of program and the ones best suited for B.C.

2) Within a reasonable time (suggested as being 24 months) from the commencement of the program, ESBC will undertake to research public awareness of the program and will report on its findings.

6.3 Other Performance Measures

In addition to the above the program will measure its collection performance in comparison to other jurisdictions with similar programs such as Alberta and Saskatchewan.

The performance of due diligence in ensuring proper handling and processing of collected materials will also be useful as a measurement of success. The diversion of materials from landfill and the consequent removal of toxic substances from the environment will be measured and reported by weight.

7. PROGRAM SCHEDULE – TARGET DATES

Public Consultation on the stewardship plan:

- August - September 2006

Submission of the stewardship plan to the Ministry of Environment:

- October 2006

Program operational:

- By June 1, 2007

8. PROGRAM INCLUDED AT PROGRAM STARTUP

The program will commence with the list of products required by the regulation:

- Computers designed for desktop use by an individual, for desktop use as a server or to be portable (not including hand-held devices). This definition includes the monitor and peripherals such as a keyboard, mouse and cables

- Desktop printers defined as a printer that will print on paper not exceeding 8.5 inches in width but not including label printers


- **Televisions**

The program does not include computers or televisions that are part of or attached to vehicles, marine vessels or commercial or industrial equipment.

Additional or expanded descriptions of eligible products will be developed as technological change requires while adhering to all program principles.

9. **FUNDING**

The program will be funded by an environmental handling fee remitted by the producer of designated products and shown separately by sellers on sales receipts. *(Note: Some smaller companies may choose not to show the fee should the costs of system changes be prohibitive. In this case the producer and/or the seller would indicate to consumers, through point-of-sale information, that the fee is included in the product price).*

The environmental handling fee will be set by product category, not a flat fee across all products, and will reflect the true costs of managing the program. The environmental handling fee will fund:

- Collection, handling, processing and recycling
- Communication and public education
- Administration expenses
- Compliance provisions

As part of our continuous improvement program we will review methods to reward in the future, in the marketplace and in an economically and efficient manner, those producers making environmental investments including the option of eliminating visible fees.

Funding mechanisms will be established to prevent cross subsidy between the major categories of electronics (e.g. between computers and televisions) so that each category bears its own, and only its own, costs of collection and recycling.

10. **SETTING THE ENVIRONMENTAL HANDLING FEE (EHF)**

The environmental handling fee will be specific to product type and will reflect the true costs of managing the program. The environmental handling fee will be evaluated on an annual basis and will be adjusted to ensure there is enough revenue generated to operate the program and
that funds are not being over or under accumulated. Fees and categories for British Columbia have yet to be established but will be harmonized, as far as possible, with fees in other provinces.

For example: the current fees in Alberta are:

- Televisions – from $15 to $45 depending on size
- Computers - $10
- Printers - $8
- Laptop/notebooks - $5
- Computer monitors- $12

In the initial phase of the program, mice and keyboards will not have an individual fees but will be included as part of the fee for computers. Transition to independent funding for these items will be done as soon as practicable.

10.1 Funding Flow

Producers will remit environmental handling fee payments to ESBC, care of Encorp Pacific, on net designated product sales (net referring to gross sales minus product returns etc).

10.2 Financing Activities in Advance of Fee Collection

Activities in advance of fee collection will be funded by Encorp Pacific and will be reimbursed from future program revenues, with interest. Examples include:

- EPSC costs for the preparation and submission of a Stewardship Plan
- Cost associated with establishing a collection network
- Development of a public education program
- Identification and assessment of qualified processors

11. RESPONSIBILITIES AND OBLIGATIONS

The program plan is based on a shared responsibility model where all affected parties have a role to play.
11.1 Producers

Producers are obligated to develop a diversion program for waste electronics that is consistent with provincial regulation, industry principles and the CCME principles. Producers are responsible for remitting the environmental handling fee to ESBC care of Encorp Pacific on designated product sales. Producers are responsible for establishing a not for profit entity to act as the stewardship agent in British Columbia or submitting and running their own program.

11.2 Supplier to the End-User (Retailer, value-added reseller, manufacturer direct sales)

Suppliers of designated products to the end-user are responsible for providing point-of-purchase materials about the program to the consumer and remitting the appropriate EHF to ESBC.

11.3 Processing and Recycling Contractors

All processing and recycling contractors will be approved under the EPSC Recycling Vendor Qualification Program and must meet, or exceed, all health, safety, export and other regulations and standards. Third party verification audits will be conducted to approve processors and monitor compliance with standards. Vendors will not be permitted to process any materials until they have successfully passed third party verification.

11.4 Provincial Government

The provincial government is expected to ensure that regulations allow for adequate fines and penalties to be levied against those individuals not in compliance with the regulation or the approved program. The provincial government is also expected to enforce program compliance in a timely and effective manner.

The provincial government is also expected to implement policies to ensure that government procurement officials only procure electronics from program compliant corporations and that government agencies pay the appropriate fees.

11.5 Local Government

Local government is expected to support the program and may wish to act as collection sites for designated material with appropriate reimbursement for services provided. Local government is also expected to support the program via procurement policies. Any designated EOL equipment collected by local governments must be recycled through the program.
11.6 Consumer or End User

Consumers will be responsible for paying the EHF at time of purchase, using the available reuse and recycling options, and for delivering designated end-of-life electronics material to collection points.

11.7 Electronics Stewardship British Columbia

ESBC will manage the program to provide an environmentally effective program at the lowest cost and will ensure that the public is kept informed of program costs and activities.

12. REUSE, RECYCLE AND DESIGN FOR THE ENVIRONMENT STRATEGY

A key element of a stewardship program is to provide sustainable options for reuse and recycling, and to provide an incentive to producers to design products with a reduced environmental burden.

12.1 Reuse

ESBC recognizes the importance of reusing older products and will establish a Re-Use Committee to refine existing re-use programs and to explore new re-use initiatives. Re-use will also be highlighted through the public awareness and communications program bearing in mind that, in the recent past, reuse programs have been used as cover for the illegal export of electronic waste. Any re-use activities and organizations connected with the program will be assessed to ensure that all activities are compliant with program principles and that re-use is not used as a cover for activities incompatible with those principles. (See Section 4 and Collection Matrix)

12.2 Recycle

Recovering material from designated EOL electronics is the first recycling option with energy recovery from plastic and wood being the second option. Landfill disposal and incineration without energy recovery is the last option. All processing will be completed by contractors who have been qualified under the EPSC Recycling Vendor Qualification Program. (See Appendix C)

12.3 Design for the Environment

The program will report on EPSC members’ design for the environment initiatives. (See Appendix B)
13. **ANNUAL REPORT**

ESBC will provide an annual report to the British Columbia government as outlined in the regulation. The annual report will be available on the program website as a PDF file. The report will include, but not be limited to, the following:

- A summary of the educational materials and educational strategies the producers have used
- The location of collection facilities, events and any changes in the number and location of collection facilities
- Efforts taken by or on behalf of producers to reduce the environmental impacts throughout the products' life cycle and to increase usability or recyclables at the end of the life cycle
- A description of how the recovered product was managed in accordance with the pollution prevention hierarchy
- An estimate of the total amount of designated products sold, the total amount collected and the final destination of materials
- Independently audited financial statements
- A comparison of the approved plan performance for the year with the performance requirements and targets in the regulation and the approved plan
- Where feasible, collection information will be provided on a sub-provincial level
PART B – ALIGNMENT WITH MINISTRY OF ENVIRONMENT
BUSINESS PLAN PRINCIPLES

Producer/User Responsibility

- Responsibility for waste management is shifted from general taxpayers to producers and users

The management of waste electronic products covered by this stewardship plan is solely the responsibility of producers and users of such equipment.

- Responsibility is not shifted to other levels of government without consent

Responsibility, limited to the performance of agreed contracts, will take place only where local governments willingly consent to involvement in the recovery system.

Level Playing Field

- All brand owners for a particular product category are subject to the same stewardship

22 of Canada’s leading Consumer electronics & IT producers have agreed to participate in a common collection and recycling program. Through market monitoring, retail competition and collection audit, non-participating brand owners will be identified and brought into the system through cooperation or, if necessary, through the enforcement provisions of the Regulation.

- All consumers have reasonable access to product collection facilities

The combination of collection sites and systems to be used for waste electronics will ensure that consumers in all regions of the province have reasonable access.

Results Based

- Programs focus on results and provide brand owners with flexibility to determine the most cost-effective means of achieving the desired outcomes with minimum government involvement

The program outlined in this stewardship plan allows for maximum flexibility in determining the most cost-effective method of achieving satisfactory recovery results. Government involvement will be minimized at all levels.

- Product categories are clearly defined to simplify compliance and enforcement and ensure common understanding among program participants
From a producer perspective, the categories defined in the Regulation are straightforward. The unknown factor is the degree to which consumers may wish to return waste electronics not specified in the Regulation. This is a key component of the consumer awareness program.

- Programs are tailored for individual products and encourage continued innovation by producers to minimize environmental impacts during all stages of the product lifecycle, from product design to end-of-life management.

Continued innovation is the hallmark of the electronics industry and design for the environment is becoming a key criterion for many products. Collection programs as detailed in this stewardship plan provide the segregation of products necessary to produce the most beneficial environmental and economic outcomes available.

**Transparency and Accountability**

- Program development process is open and provides opportunity for input from all stakeholders.

- This stewardship plan is the result of extensive consultation with all stakeholders over a period of several years. It also allows for continuous feedback from producers, consumers and other stakeholders to ensure that the system is refined as it matures. Industry is accountable to both government and consumers for environmental outcomes and the allocation of revenue from fees/levies.

The electronics industry is acutely aware of the need to be accountable to consumers for its environmental performance so much so that it has voluntarily established the vendor qualification program. Through the reporting mechanisms outlined in this stewardship plan and in particular through the extensive auditing of recyclers, ESBC will provide ample opportunity for government and public oversight of its operations and a full accounting of fee revenues.
PART C – CONFORMITY TO THE APPLICABLE APPROVAL CRITERIA OF THE RECYCLING REGULATION

PART 2 Section 5 (1)

(a)  
   (i)  a 75% recovery rate or a higher recovery rate established by the Director

   ▪ SEE Part A, Section 6

(b)  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 product stewardship program….

   ▪ SEE Appendix A

(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…

   ▪ SEE Sections 9 and 10

   (iii) reasonable and free consumer access to collection facilities

   ▪ SEE Section 5.1 and Collection Matrix

   (iv)  making consumers aware of:

       6.1 the producer’s product stewardship program
       6.2 the location of collection facilities, and
       6.3 how to manage products in a safe manner

   ▪ SEE Section 4

   (v)  assessing the performance of the producer's product stewardship program, the management of costs incurred by the program and the management of environmental impacts of the program,

   ▪ SEE Sections 6, 5.1, 12.3 respectively
(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 product stewardship program,

- All contracts between Encorp and persons providing services contain standard commercial language outlining dispute resolution procedures

(vii) eliminating or reducing the environmental impacts of a product throughout the product’s life cycle

- SEE Vendor Qualification requirements (Appendix C) and industry Design for Environment report (Appendix B)

(viii) the management of the product in adherence to the order of preference in the pollution prevention hierarchy.

- SEE BELOW

POLLUTION PREVENTION HIERARCHY

This section describes how this stewardship plan will adhere to the relevant stages in the Pollution Prevention hierarchy as described in Part 2, Section 3 of the Recycling Regulation

(a) reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency

- See industry Design for Environment report (Appendix B)

(b) redesign the product to improve reusability or recyclables

- As in (a) above

(c) eliminate or reduce the generation of unused portions of a product that is consumable

- Not applicable

(d) reuse the product

- See Section 4.2 and Collection Matrix

(e) recycle the product

- See Section 5.2
(f) **recover material or energy from the product**
   - See Section 5.2

(g) **otherwise dispose of the waste from the product in compliance with the Act**
   - Any residues remaining from recycling will be disposed of in compliance with the Act
PART D – ALIGNMENT WITH THE CANADIAN COUNCIL OF MINISTERS OF THE ENVIRONMENT – CANADA-WIDE PRINCIPLES FOR ELECTRONICS PRODUCT STEWARDSHIP

Preamble

The management of used electrical and electronics equipment (e-waste) is rapidly becoming a major public policy issue in Canada and elsewhere around the world.

Environmental concerns relate to the potentially hazardous nature of some of the materials these products contain and the increasingly large quantity of these products that require disposal in waste management systems. E-waste may contain lead, cadmium, mercury, and other potentially hazardous materials.

In accordance with CCME principles for pollution prevention, producers of electrical and electronic products are responsible for their products at end-of-life. It is widely recognized that legislative/regulatory initiatives are required to establish a level playing field for industry in the management of e-waste. The objective of these Canada-wide principles is to assist and support jurisdictions in the development of e-waste programs. While recognizing differences in the legislative/regulatory framework and existing programs among jurisdictions, CCME encourages regional or national cooperation in the development of e-waste programs. Specific measures undertaken by each jurisdiction will be at their discretion, with the goal of effective, efficient, and harmonized implementation.

To promote harmonization of approaches to the greatest extent possible, and to prevent market distortions among jurisdictions, the Canadian Council of Ministers of the Environment (CCME) endorses the following Canada-wide principles for electronics product stewardship:

Principles

1. Responsibilities associated with management of e-waste are primarily borne by producers of the products, where “producer(s)” means the manufacturer, brand-owner or first importer of the product who sells or offers for sale the product in each jurisdiction.
   - Under this Stewardship Plan all management of e-waste is borne by the producers of the products

2. Costs of program management are not borne by general taxpayers.
3. Environmental and human health impacts are minimized throughout the product life-cycle, from design to end-of-life management.
   - All costs of this program are borne by consumers and producers of designated products
   - Product design and manufacture of obligated products is constantly being renewed by competitive pressures as well as through federal/provincial and international regulations and standards. End-of-life processes covered by this Stewardship Plan are completed under strict environmental and human health guidelines as well as meeting all relevant regulations

4. Management of e-waste is environmentally sound and consistent with the 4R waste management hierarchy:
   - Reduce, including reduction in toxicity and redesign of products for improved reusability or recyclables
     - Obligated producers covered by this Plan are constantly reviewing the use of toxic materials and redesigning products to conform to tightening international standards and regulations as well as to keep pace in a highly competitive market. (See Appendix B)
   - Reuse
     - Reuse options will be communicated to promote reuse prior to equipment entering into the collection and recycling system outlined in this Plan. (See Part A Section 4 and Collection Matrix)
   - Recycle
   - Recovery, of materials and/or energy from the mixed e-waste stream
     - All remaining materials collected under this Stewardship Plan are processed, under strict environmental and safety standards, to recover base (glass, metals, and plastics) with material recovery as the first priority, energy recovery as the second priority and disposal as a final option. (See Part A, Section 5.2)

5. Consumers have reasonable access to collection systems without charge.
   - Under this Plan consumers and businesses throughout BC have convenient access to collection points and systems without charge.
6. Education and awareness programs ensure that consumers, retailers and other stakeholders have sufficient information on program design and knowledge of their roles.
   - The Plan calls for a continuous program of consumer education and awareness

7. Program design and implementation will strive for equity and consistency for consumers, particularly between those who live in adjacent jurisdictions and between those who live in small, rural and remote communities and large urban centres.
   - As per 5 above

8. Adjacent jurisdictions will strive for consistency in e-waste products collected.
   - The obligated products and recycling standards in BC will be broadly consistent with those in Alberta and Saskatchewan

9. Programs will include residential, commercial, historic and orphan products.
   - This Plan addresses the above-named products and user categories

10. Programs will report on performance, specify objectives and targets, and be transparent in financial management.
    - This Plan commits the industry to providing regular public reports on the above topics

11. E-waste is managed in the most economically and logistically feasible manner, while striving to maximize local economic and social benefits.
    - This Plan will strive to operate in the most economical and feasible manner while providing the maximum in local benefits

12. E-waste is managed in the most economically and logistically feasible manner, while striving to maximize local economic and social benefits.
    - This Plan limits the recycling of products to facilities located only in OECD countries with no allowance for onward export
PART E – ALIGNMENT WITH EPSC GUIDING PRINCIPLES

EPSC Guiding Principles for Developing a National Program

1. Level playing field for all involved companies

   Provincial governments must be prepared to put into place sufficient enforcement mechanisms so that all affected companies will be required to participate.

   Both the Recycling Regulation and the ESBC stewardship plan include mechanisms designed to minimize the number of obligated producers not participating in the program.

2. Shared responsibility

   Local, provincial and federal governments, consumers and other stakeholders should be responsible for maximizing the use of existing waste management infrastructure. Industry should be responsible for pickup and recycling.

   The ESBC program is designed to make the maximum use of existing infrastructure.

3. Consumer waste stream

   The focus here is to manage and dispose of those products in the consumer (i.e. municipal) waste stream, as opposed to commercial products.

   The Electronic Product Category schedule of the Regulation and the ESBC program are designed to deal with products in the consumer waste stream.

4. Economic and environmental efficiency

   The lowest overall costs must be the goal of any program, and we must ensure that we develop industry benchmarks for both acceptable costs and effective environmental management.

   The ESBC program is designed to establish benchmarks for both activities.

5. Fair treatment of historic waste

   Historic waste must be dealt with in a fair and equitable manner that does not penalize existing manufacturers.

   The ESBC program will deal with historic waste in a fair and equitable manner that does not penalize existing manufacturers.

6. Environmental management
End-of-life products must only be managed in locations that have environmental and health laws acceptable to Canada.

The ESBC program meets this standard.
The core of the stewardship plan was based on the interim plan developed by Electronic Product Stewardship Canada (EPSC) in cooperation with a B.C.-based Advisory Committee. This committee is comprised of a cross section of stakeholders including the Ministry of Environment, local governments, NGOs and the electronics industry including retailers.

The product of this collaboration was a document used as a key part in identifying and selecting a suitable provincial operating partner for EPSC. It also addressed many of the key principles and requirements of the Recycling Regulation but was not, by its nature, able to address the specifics of how the collection and recycling system in BC will work.

The next phase was to develop a stewardship plan which expanded on the operational aspects of an e-waste collection system for the province.

**Phases:**

1. Using the original plan as the basis, an amended plan was drafted to cover such areas as collection methods, public awareness and education, transportation, the qualification process for recyclers and how computer re-use programs will be supported. The amended plan was circulated to the Electronics Advisory Committee at the beginning of August 2006.

2. The Electronics Advisory Committee reviewed the plan and the consultation process and provided comments by mid-August.

3. On August 15th, 2006, a broadcast e-mail was sent to all Regional District Recycling coordinators as well as to an extensive list of stakeholders announcing that the draft plan, along with the Recycling Vendor Qualification Standards, were available on the Encorp, EPSC and RCBC websites. Recycling Coordinators were encouraged to circulate the information widely to interested parties in their region.

4. On September 6th, 2006, an information release on the plan and the consultation process was prepared and sent to all community newspapers in the province via Canada News Wire. At least four community newspapers and two radio stations are known to have run the item.

5. In September, open public meetings were held in Prince George, Vernon, Surrey and Nanaimo. Written comments on the plan from all sources were accepted until September 29, 2006.

**MAIN THEMES OF COMMENTS RECEIVED AT THE PUBLIC MEETINGS**

**PRINCE GEORGE – September 12**
Messaging needs to be as specific as possible about what materials are eligible for return and a process for handling non-designated materials will be needed when these are dropped off at a depot.

Access to drop off points is paramount in Northern B.C.

If the public awareness program for electronics mirrors the current Encorp beverage container program it will be fine.

How will the program interact with individual manufacturer programs, e.g. Dell?

Concern was expressed about benchmarking performance; the use of statistical surveys was encouraged.

**SURREY – September 13**

Main themes:

- EPSC- Recycling Vendor Qualification – Some recyclers still not clear on how it will be administered and how well it will prevent exports.
- Collection Network- who can participate, what will the incentives be, can municipalities participate, etc.
- Reuse – How will the program encourage, police, track, etc. so potentially “useful” electronics are not brought to an “end-of-life” stage prematurely.

Other concerns:

- Data privacy is of concern both from ensuring final destruction of hard drives to concern about pilfering from depots.
- Will large users (e.g. governments) pay the fees?
- How will ESBC ensure that obligated producers participate and how will fees be collected from on-line and out-of-province sales.
- Concern for collection in northern and remote areas along with the suggestion that ‘roving’ collection points may be useful there.
- How big is a “large user”? It was reported that the City of Vancouver has 50 pallets of material for disposal. Need for these large users to deal directly with ESBC.
- How will the system handle competition for scrap materials from those willing to pay for it and ship it overseas?
- Public outreach through local government: Key messages need to be included in local government materials, e.g. recycling calendars, and to be featured on municipal websites. Program should provide brochures, posters and other materials to local governments.
• How does re-use fit into the program and can a collector also be a re-user?

• If there is no fee to drop off historic waste why should a new purchaser subsidize previous purchasers?

• How and when will the selection of collection points be done and will municipalities that participate be paid the same as depots?

• On what basis will the selection of collection points be made? Geographically, by volume, etc.?

• Special events should be held at program launch to both promote the program and to reduce the anticipated “tidal wave” of historic waste.

• A key message for the program is to clearly outline what is, and what is not, eligible for return.

• Some local governments are concerned that there may be stockpiling at collection points.

• Will federal, provincial and local governments pay the fees on new equipment?

• Will there be a fee on sales of used computers? Can computer components be sold? For computers collected for responsible re-use outside the province will there be a rebate system?

• How will processors be audited?

• The program will need a specific plan for dealing with large volumes from businesses/institutions/governments.

• The computer re-use industry wants to be involved with large volume sources (e.g., governments) since they provide the highest value equipment for re-use.

• Students are a critical audience for the public awareness program.

**VERNON – September 14**

• Clear messaging will be needed and schools are a key audience.

• How will depots know if what they take is really a ‘computer’ e.g. missing components and how will the return of computer parts (replaced hard drives, power supplies, and mother boards) be accommodated.

• General concerns about environmental risks in transporting and processing.

• Who is responsible for the privacy of data?
Many agencies already do collect computers and televisions and can provide data on collection procedures.

Existing collectors/re-users should have an equal opportunity with bottle depots to become an authorized collection point and should be allowed to assess and re-use computers.

Existing collectors/recyclers need to be able to cull out re-useable computers from returns but still get support from the program for any EOL equipment that they take back. They currently charge for the service but would be willing to work to the program’s requirements for no drop off charges as long as they still had the ability to refurbish and reuse equipment.

Public awareness program must include local governments, e.g. provision of brochures, posters, website material, etc.

### Attendees for Public Consultation Meetings

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<td>School District No. 67</td>
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Please find this letter and include it in your response to BC government.

E.R.A hereby requests to sit on the board of the newly formed non-profit organization to ensure that Encorp and this newly formed non profit organization will promote reuse, and not just though Recycling Council of BC which you suggested at the meeting.

We find it unusual that Encorp and EPSC will use Recycling Council to make recommendations as the president of the recycling council is Bert Monesmith, who runs Genesis Recycling, which will become a major profiteer of this program. We feel this is a large conflict of interest which will result in small computer stores, non profit agencies not receiving any recommendations from Recycling Council and Encorp.

E.R.A involvement and a board position will ensure this will not happen, and will guarantee that the local community organization and small computer stores also get to benefit from this program.

E.R.A feels that Encorp would not sufficiently promote reuse options such as 1000’s of used computer stores in British Columbia, used computers wholesalers and dealers, as well as 100’s of charitable organizations that need second hand computers. ERA’s would ensure all of these organizations are included in the upcoming program.

E.R.A has formed a non profit organization is British Columbia, by the name of “Computer Donations and Recycling of British Columbia Association” which is comprised of several large retailers, and a large amount of local businesses, computer stores, and repair shops who wish to participate in this program.

E.R.A has also established a 20,000 square foot “Computer and Electronics Depot” in downtown Vancouver. This depot will be run by the newly formed non profit organization “Computer Donations and Recycling of British Columbia Association” and will act as a sorting depot for old electronics.

In our years of running this type of program in Alberta, we have determined that 1000’s of used computers disposed by residents and businesses are still very useful and valuable to the local community. We wish to ensure that the local small businesses have access to this equipment, and that the local charitable and non profit organizations can also receive free computers to use for their socially beneficial causes.

Your program design will eliminate the community benefit. The no reuse policy of your program will in fact hurt local businesses, small computers stores, etc. It will also prevent charities and non profit agencies from receiving donated computers, as now only “authorized” recyclers will be able to handle used computers.

Encorp program threatens small business, computer stores, etc. With Encorp’s program, people will now associate old computers with bottle depots and take them off the market. ERA will work with many small and large retailers who will collect equipment, as well. This will ensure that reusable computers will benefit the local small businesses, charities, and poor people. It will also ensure maximum recycling. Reuse is the most important step of recycling, and should be the first choice. Municipal and private landfills will also participate in the program to collect old computers for donation and recycling.

Electronic Recycling Association (ERA) is a private, not-for-profit, corporation established to manage the collection and sorting, of used computers and electronics discarded in B.C. ERA also provides donations of thousands of computers to various charities and non profit groups across Canada. ERA contracts equipment wholesalers and retailers to manage usable computers, as well as certified recyclers to manage the end-of-life product for commodity recycling in Alberta and B.C.

Electronics recycling program current being developed by Encorp and EPSC has fundamental environmental mistakes as well as some other conflicts which are described herein. First of those is that reuse is not even a part of the program. Reuse will be encouraged but not implemented or enforced. Inclusion of ERA on the board of directors will ensure that reuse will be implemented and enforced.

Era has learned that this program supports smelting which is not very environmentally friendly at all.

From our years or running a similar program in Alberta we have identified that a very large percentage of these computers and electronics can still very much be useful. ERA has donated 1000’s of computers found in landfill collection points to various non profit agencies, charities, and poor people. The social benefit to the community is undeniable and unmatched by
this new recycling program being developed.

Unfortunately since program is developed by large manufacturers who similar to the oil companies have agreed to prevent this equipment from being donated or made available on the market. Therefore enabling more new products to be sold to make greater profits.

ERA proposes to administer the program alongside Encorp and be on the board of the newly developed non profit agency that will be created to run the program.

ERA will be responsible for setting up a very efficient and fair collection program.

From years of experience ERA can create a program which allows municipalities, private companies non profit agencies and the entire community to benefit.

Depots to be setup in private drop off points, computers stores, and bottle depots, and landfills which receive a collection kickback fee from Encorp and the newly developed group.

All equipment would be tested and sorted at large depots similar to ERA’s 20,000 square foot computer and electronics depot in downtown Vancouver.

Various volunteers and peoples with disabilities would be able to take part as well therefore creating more jobs and volunteer opportunities.

Working equipment would be made available to all local charitable agencies at no charge. Current ERA holds a request list for BC charities for over 100000 computers which are urgently needed.

As supply grows in thus wealthy province equipment would be made available to agencies across the world at a fee or a as form of foreign aid or donation. Only qualified countries with a recycling program in place or in development.

Further equipment would also made available via wholesale channels to various approved parties.

End of life to be recycled locally through a certified processor qualified by EPSC standards.

Please help us include ERA in this upcoming program by scheduling a meeting with myself to discuss these points and many more and to determine how you can help include ERA in the administration of the new recycling program.

Our system has obvious benefits and would supplement and improve the system being developed by EPSC and Encorp.

I look forward to meeting with you in the near future to discuss opportunities available to ERA in this new program, and to explain to you in more details the flaws in Encorp running the program alone, as well as the many benefits of ERA being included in this program and well as the social benefits to the communities of British Columbia, Canada, and even the benefit we can have to the entire world.

Sincerely,
Bojan Paduh
President
Electronic Recycling Association of Alberta
Computer Donations and Recycling of British Columbia Association
(403) 703 9818
www.era.ca
I am a librarian by training, and a graphic artist, among other things. Three years ago, I returned to the Comox Valley. It was a changed community. I struggled for almost a year to find paid work. While searching, I volunteered at ValleyLinks, the local CAP. I also volunteer at the computer recycling events when they occur.

I am aware that a stewardship plan is in the works. I have also heard that there was suppose to be public consultations held, and that there was ONE on the Island on September 15. Hardly, a consultation. Therefore, I'll voice my concerns in a letter, so that it will be included in the appendix of Encorp's final plan. My concerns are as follows:

1. It would not be prudent to automatically mark all electronic items dropped off at facilities for deaccessioning. Reuse of working systems must be allowed for, since many communities donate these systems to non-profit organizations and disadvantaged individuals. Libraries provide some access to individuals, but their stations are limited in number, as are the time slots allowed for use of the systems.

2. The Comox Valley has an organization that recycles and refurbishes e-waste, and that is CompuCycle in Cumberland. They have been a great asset to the community, and have provided employment opportunities. Not only have they donated many computers back to the community, but they have diverted tons of e-waste from the landfills. Since they are already doing what the stewardship program plans to do, and have been operating for over three years, Encorp would be wise to contract CompuCycle to act as a depot.

3. My last concern is that the public consultation process was held in only 4 communities, and it appears there was little effort made to ensure notice. Let's hope this is not indicative of tactics by Encorp or the government to exclude community groups and services from continuing to donate working electronics or to qualify as depots.

I trust these concerns will be addressed by Encorp and the Ministry of the Environment before the final contract is approved. Thank you.

Sincerely,
Karen E. Jones
PO Box 1176
Cumberland, BC
V0R 1S0
1-250-336-7939
From: Gavin Munday [mailto:gmunday@shaw.ca]
Sent: Thursday, September 21, 2006 5:11 PM
To: Doug Merrier
Subject: Re: Request for public comments on recycling electronic waste

A program for recycling electronic waste (e-waste) in BC and across Canada is long overdue. The general public is in strong agreement that e-waste which contains toxic materials should not be going into landfills. Here are a few comments on what such a program should look like.

1) The recycling program should be comprehensive covering not just computers, printers, and monitors, but all kinds of e-waste. For example, it should include cell phones, telephones, pagers, photocopiers, fax machines, audio/video equipment, small household appliances, etc.

2) The recycling program should charge environmental fees at the time of purchase. These fees should cover the full costs of recycling including collection, transportation, and processing, and should also provide a partial refund as an incentive for people to return e-waste to collection facilities. The refund must be high enough so that people will be motivated to return e-waste to collection facilities rather than throwing it out.

3) The environmental fees should be called "fees" and not "taxes". All of the money collected must go towards recycling.

4) Most important of all is how the e-waste is to be processed. The recycling needs to be done right. Firstly, no e-waste should be shipped overseas where environmental standards and workplace health and safety standards are inadequate. I would suggest that there is already a state-of-the-art recycling facility in Canada that should be used. It is the only one of its kind in Canada. The 82,200 square foot Noranda Recycling Facility located in Brampton, Ontario can process approximately 16 million kg of e-waste per year. All material is 100% recycled and nothing is sent to landfill. Loaded shipping containers could be sent by rail. What is needed is one central facility (or at most a few) with economies of scale that do things right. Link: Re: http://www.norandarecycling.com/facilities/brampton.htm

5) Keep it simple

Thank You
Gavin Munday
604-433-0919
Some items to consider when you are creating the Electronic Stewardship Plan:

Environmental Fee & Mail Order:
A significant portion of our community's computers are supplied by mail-order. I trust you have the cooperation of significant mail-order suppliers such as Dell. (Dell has also moved into T.V. sales)

Environmental Fee on Computers and TV's only?
I developed a long list of questions for you about what constitutes a T.V. versus a Computer but then I reviewed the explanations on Alberta's recycling website. They appear to have the bugs worked out through numerous revisions over the past two years. Please do follow their lead very carefully.

With LCD's taking over there is already very little difference between computer monitor and a Television. Probably just need a single category of item, based on size.

Tax Collector:
As a computer dealer I am forced into the expense of collecting, administering, accounting for, paying the bank handling fees and submitting provincial sales tax and federal sales tax. Your proposal for a point-of-sale environmental fee will add additional financial burden to my already struggling company.

Return for a Refund:
It is easy enough for you to implement a new tax for recycling but why fool around with compliance? Give the consumer back some money when they turn in their electronics! I'm not sure I've ever seen a pop can or a beer bottle littering our roadside because people go to huge efforts to round up these items so they can collect the money. This is much, much better than hoping people will make a special effort to voluntarily deliver their electronics to a special depot.

Thanks for your consideration
Aird Flavelle
MSA Computer Ltd.
31550 South Fraser Way
Abbotsford, B.C. V2T 4C6 604-855-4221
Gentlemen,

It has come to my attention that changes are taking place as to how EOL electronic equipment will be disposed of with the contract to Encorp.

A disturbing lack of public consultation has occurred with the awarding of this contract. Community-based groups (who already struggle more with slashed Government spending) may be completely bypassed with these changes. Useable equipment that would mean great assistance to these groups and other disadvantaged individuals would no longer be able to pass through a refurbishing process and be provided at little or no cost by local organizations who have been undertaking this type of work.

I urge you to ensure that useable equipment that can be effectively refurbished and provided to groups and individuals be included in any planning as you move forward with these changes.

Our local group ValleyLinks has provided a tremendous service and hundreds of groups and individuals have been able to have computers to use. If your concern is an undermining of the retail sector please be assured that the groups and individuals who have been beneficiaries of this program would not and continue to not have resources to provide computers for themselves any other way. There is a negligible if non-existent impact on local computer retailers and many groups and individuals are now able to do business in our computerized world.

Please continue to ensure that equipment in good working order can be refurbished and made available in this manner to the groups and individuals throughout the Province who find this type of program the ONLY way they can afford computers.

Thanks you,

Jack Minard,
Courtenay, BC
Dear Doug:

It was a pleasure to meet with you in Nanaimo on Sep 15, 2006 at the public consultation regarding e-waste stewardship in British Columbia. There certainly was some lively conversation that I am hoping will impact the direction taken as Encorp continues in the development of the program.

Our Society has been supporting the technology needs of a large area of North Vancouver Island since 1997. In 2003 we began an expansive e-waste stewardship program to serve this area. To date we have diverted more than 500,000 lbs of e-waste (we passed the 500,000 mark the week of Sept 15th) and we have donated more than 600 good working computers to voluntary sector organizations and disadvantaged individuals in the past 3 years. Many more have been sold at low prices to low income individuals and businesses that could not otherwise afford the “luxury” of a computer.

As discussed there are several points that we strongly feel require consideration and conversations with fellow community members has shown a concern on the part of the communities we are serving as well, (see attached), I trust that you have also received several comments sent directly to you.

First is the definition of End of Life (EOL). There is nothing in place to facilitate a process that keeps working systems benefiting our communities like we already have. In fact the process that was described will significantly decrease the chance of reuse as systems dropped off will automatically be deemed EOL based on the fact that they are dropped off. It is our experience that many items dropped off are good working systems, in fact we currently have projectors worth thousands of dollars and color laser jet printers worth thousands of dollars in use that were brought in as garbage.

Under the proposed program many of these would have been deemed EOL thus destined for disposal. We ask that community organizations be given the option to divide the incoming into two streams rather than one. At one point it was stated that if we are to continue to refurbish we will be disqualified from becoming a drop-off point and receiving funding from the BC Ewaste Stewardship funds. The funding from the EOL stream is what allows us to serve thousands through our programs and services and allows us to support other organizations programs and services.

My second concern is a priority system of who will be contracted to act as a drop off point has been set. Existing community groups and non-profits appear to be the least desirable option and appear to be the least likely to be awarded the contracts by Encorp. Once again this means that good equipment will enter the EOL stream. This was discussed in detail and confirmed.

With a well written contract there is no reason we cannot continue to be involved in this process and thus continue to provide vital programs and services. If my concerns become reality there will be no method to support refurbishing and 100’s of North Island organizations and programs will be affected as well as the thousands of people using their services.

My third concern is that the public consultation process was held in only 4 communities, there was no provincial government representation at the meeting I attended and it appears there was little effort made to ensure notice. In fact it was by chance I was included. Furthermore, it appears that organizations providing similar services to ours have been overlooked throughout the province.

I ask that amendments are made in the final plan to allow diversion of working electronics and an opportunity for community groups to be qualified at the same time as depots, by the same criteria without an exclusionary priority list.

I left the meeting with many other concerns, however the issues of what happens after collection are being addressed by EPSC who are setting the standards for Canada and that is another letter. The above concerns can easily be addressed by Encorp and the Ministry of the Environment prior to finalizing the contract.
Sincerely,
Bev Moquin
Executive Director

Beverly Moquin

CVCISS/ValleyLinks
Home of CompuCycle

cc:  Honourable Berry Penner, env.minister@gov.bc.ca
     Electronic Product Stewardship Canada, (David Betts, President and CEO, dave@epsc.ca)

(Also included with the submission from CVCISS were five letters of support from public service agencies which have been assisted by the CVCISS program)
Dear Minister for the Environment, Honorable Berry Penner

It is with extreme concern and regret that I am writing to you regarding recent information I received about the future plans for the British Columbia Stewardship Plan for End-of-Life Electronics.

As the Project Coordinator for Volunteer Comox Valley, it is very evident to me the great need for computers and information access in our community. The ReCentre Program was invaluable in that it refurbished hundreds of computers that were donated back into the community to non-profit organizations and disadvantaged families. I cannot reiterate strongly enough how this access to technology has touched many of our Voluntary Sector Organizations, their clients and volunteers.

Many have benefited from this program such as; families who were provided with computers enabling their children to deliver quality homework, organizations who’s clients of varying disabilities have been effected on a daily basis, not to mention that these computers have also assisted these non-profit’s in their administration and technology challenges. The ability to make connections with friends and family, learn new communications skills, play games, look for employment, do a resume or just keep up to a fellow student have helped the disadvantaged in our community thrive. These simple yet vital computers have linked people who may have otherwise had little outside contact in effect helping them feel valued and part of our community.

These computers may seem obsolete to some but as you can see, find new life with our non-profit and voluntary sector and people who just can not afford to buy a new computer let alone provide internet access. Have you heard the quote, “One man’s trash is another’s treasure!” Well this is a prime example wouldn’t you say?

We implore you consider the implications of “trashing” all electronics. Yes, many people can afford to upgrade their old computer systems and just want to be rid of them but why not extend the life of these computers and while your at it enhance someone’s life who would otherwise just go without. What will it cost you in the long run?

Of course there is also the environmental issues surrounding this proposal! Will all of that toxic e-waste be disposed of responsibly?

Thanking you in advance for your consideration of all aspects of this new proposal.

Yours in Community,

VOLUNTEER COMOX VALLEY

Adda Vallevand, Project Coordinator
Phone: (250) 334-8063
Fax: (250) 338-2488
Email: adda.vallevand@iscn.ca
www.valleylinks.net
www.volunteer.iscn.ca
September 26, 2006

Mr. Doug Merrier  
Encorp Pacific (Canada)  
206 - 2250 Boundary Rd.,  
Burnaby, BC V5M 3Z3

Re: Public input for the BC Stewardship Plan for End-of-Life (EoL) Electronics

Dear Doug:

Thank you for the opportunity to provide feedback on the proposed recycling initiative. I believe the plan is a very important step in helping to ensure that e-waste is properly disposed of in BC.

I am particularly interested in ensure the education component of the plan is an effective tool to motivate BC residents to first consider the reuse potential of their equipment. Just as important is that the educational component provides a clear and easy way for the public to find a reuse organization.

I am proposing three strategies to increase the reuse rate:

1. Electronics Product Stewardship Canada (EPSC), British Columbia Electronics Stewardship (BCES) and Encorp should seek the input of reuse organizations as part of the development of the education component/reuse message. This consultation could be coordinated by the Recycling Council of BC (RCBC).

2. Any communication media or materials related to the stewardship program should have a simple call-to-action for residents interested in providing their hardware for reuse. I suggest that call-to-action would be providing the RCBC web site and/or call the RCBC recycling hotline (1-800-667-4321) on all EoL plan communication materials and media. RCBC is a non-biased organization that can refer the public to the closest quality reuse organization in his/her local area.

3. Utilizing the RCBC to facilitate the education and reuse components of the plan is both effective and adds transparency to this important effort. Based on the value the organization can add to the plan, RCBC should be fairly compensated for its contribution.

Using RCBC as the call-to-action would require adding capacity to its hotline services. Although this is an added cost that EPSC, BCES and Encorp should help fund, the longer term benefits for the credibility, transparency and effectiveness of the EoL Electronics Stewardship plan are well worth the investment.

Sincerely,

[Signature]

John Houck  
Executive Director

cc: Brock MacDonald, Executive Director, Recycling Council of BC  
Dave Betts, President, Electronic Products Stewardship Canada

BC Technology for Learning Society  
2200 Douglas Road, Burnaby, BC V5C 5A7  
phone: (604) 779-5646  fax: (604) 648-9628  email: jhouck@cfsbc.ca
Good morning,

**RE: Electronics Product Stewardship Plan - Additional Comments**

Please find attached a few additional comments to Encorp's Proposed Electronics Product Stewardship Plan.

We would appreciate taking another look at the plan once it has been approved by the Ministry of Environment, and as soon as more details on depot locations and the program's general operations are available.

We look forward to working with you in the future to ensure the program's success.

Kind Regards,

Sabina Kasprzak
Environmental Services Assistant
Engineering Department
Direct phone: 604.702.5047
Toll free in BC: 1.604.528.0061
Fax: 604.702.5467
Email: Environment.Assistant@fvrd.bc.ca

Fraser Valley Regional District
#1 - 45950 Cheam Avenue
Chilliwack, BC V2P 1N6
Attn: Malcolm Harvey  
Corporate Communications, Encorp Pacific

Doug Merrier  
Program Manager, Encorp Pacific  
Electronics Recycling

September 29, 2006

Good morning,

RE: Electronics Product Stewardship Plan - Additional Comments

Please find attached a few additional comments to Encorp's Proposed Electronics Product Stewardship Plan.

We would appreciate taking another look at the plan once it has been approved by the Ministry of Environment, and as soon as more details on depot locations and the program's general operations are available.

We look forward to working with you in the future to ensure the program's success.

Kind Regards,

Sabina Kasprzak  
Environmental Services Assistant  
Engineering Department  
Direct phone: 604.702.5047  
Toll free in BC: 1.604.528.0061  
Fax: 604.702.5467  
Email: Environment.Assistant@fvrd.bc.ca
Please take the following points into consideration, prior to finalizing Encorp’s Provincial Electronics Recycling Program:

**RE: Electronics Product Stewardship Plan – Additional Comments submitted on behalf of the Fraser Valley Regional District**

1. **Public Education**
   - Making information brochures outlining the Program’s key message, available to Regional Districts, Municipalities and various Community groups, will help communicate the program’s purpose and objectives to key audiences within BC communities.

   - Targeting specific audiences in the Program’s Public Education campaign will ensure better understanding, and result in greater consumer compliance throughout the program.

   Ex: Key audiences/ Consumer groups identified in the Public Education campaign could include (but not be limited to):

   - **Students (High school and University).**
     Young people, between the ages of 15 – 27, have been identified as key electronics consumers: customizing an e-waste recycling message aimed specifically at this demographic, in a manner easily understood by young people, may encourage youth to take recycling more seriously.

   - **Corporations/ Businesses/ Schools (high volume electronics consumers)**
     Once the semantics of recycling, collecting and transporting large quantities of electronics have been determined, it may be beneficial to inform this consumer group about how the program plans to accommodate high-volume consumers.

   - **General Public (household electronics consumers)**
     The following information should be communicated to all audiences:
     - Why we need an Electronics Recycling program
     - What the environmental and health hazards associated with improperly disposed of electronics waste are
     - Where Electronics may be dropped-off
     - When the program will be “depot ready” and “open for business”

   In addition to this, two points which continuously raise public concern, and should be emphasized in the public education campaign are:

   - **Data confidentiality concerns:** make it clear that it is the consumer’s responsibility to clear the computer’s hard disk prior to dropping it off at a recycling depot. Encorp Pacific will not be held liable for any confidential information remaining on the hard disk once it has been dropped off for EOL recycling.

   - **Environmentally sound disposal of electronics:** several individuals and organizations are concerned about electronics being shipped off to regions of the world, where there is no legislation or adequate enforcement of environmentally safe e-waste disposal. Emphasize the fact that all e-waste processors will be bound by firm Vendor Qualification Requirements and periodic audits will also ensure processor compliance with rules governing environmentally sound disposal of electronics.

2. **Re-Use Component**
   - Even though Encorp plans to ONLY be involved in the end of life recycling of electronics, it may be beneficial to consumers, to include some information on Re-use options on Encorp’s website.
Someone at the meeting suggested that computer Re-use information should be amalgamated into RCBC’s current internet database, in which case, providing a direct link to RCBC’s website on Encorp’s home page should be considered.

Encorp seemed hesitant to list any Re-Use organizations, which currently do not meet Vendor Qualification requirements, on their website.

Agreeing to list these organizations on Encorp’s or RCBC’s website once they provide proof of meeting Vendor Qualification standards, would provide an incentive for these companies to seek the required approval.

The general public would also benefit from this arrangement, by having access to Re-Use options prior to taking computers to EOL facilities.

3. **Fair Re-imbursement**
   - Fair reimbursement should be provided to primary operators of current and future recycling depots. Municipalities and Regional Districts should be reimbursed for any part they may play in depot operations, or computer round-up events carried out throughout the program.

4. **Room for Public input & feedback**
   - After launching the program, please consider providing a “public input & feedback” section on your website, where members of the general public will be able to let you know what works and what doesn’t, especially during the first five years of the program. Information compiled in this section may be helpful in determining what changes need to be made to ensure greater program effectiveness in the years to come.

5. **Environmental Handling Fee**
   - Based on Encorp’s current plan, the Environmental Handling Fee will be absorbed in its entirety by the consumer at point of sale, while electronics producers’ role will be limited to ensuring that these funds are spent on program operations.

   This arrangement may meet with some resistance considering that the consumer is the sole party burdened with the program’s expenses, while the producers and vendors who ultimately profit from computer manufacturing and sales are spared from taking their share of financial responsibility for this project.

   In everyone’s best interest, covering the cost of the Environmental Handling fee should be equally divided between the electronics consumers and producers.
September 29, 2006

Doug Merrier  
Program Manager, Electronics Recycling  
Encorp Pacific (Canada)  
206 – 2250 Boundary Road  
Burnaby, BC V5M 3Z3  
Submitted via email to: doug@encorpinc.com

Dear Mr. Merrier,

Re: Electronics stewardship plan (August 2006 draft)

Thank you for inviting feedback on your draft electronics stewardship plan. The following comments have been prepared by GVRD staff in consultation with staff from our 21 member municipalities and one electoral area. In our regional district, solid waste management responsibilities are divided between the GVRD, the municipalities and the private sector. The GVRD provides the regional disposal infrastructure, including six transfer stations, a landfill and a waste-to-energy facility. (The City of Vancouver also operates an additional transfer station and landfill as part of the system.) Municipalities collect residential garbage and recyclables through curbside and/or depot recycling. Businesses independently hire private haulers to collect their garbage and recyclables.

The GVRD is a member of the BC Electronics Advisory Committee and we are pleased that most of the feedback we provided during the plan development phase has been incorporated into the document. The plan clearly aligns with the Ministry of Environment’s business principles for product stewardship and respects BC’s policy framework for full producer responsibility. In particular, we support:

- The delineation of responsibilities, especially the fact that producers are clearly responsible for the program.
- The extensive public education and awareness program, with emphasis placed on reuse.
- The electronics recycling standard and the third-party audit process for recyclers.
- The competitive process and contractual arrangements for collection points, and the provision that collectors will be paid by a portion of the environmental handling fees.
- The extensive collection network with a broad range of options to suit urban and rural needs, different types of end users and different consumer preferences.
- The environmental handling fees set by product category to reflect the true cost of managing each product.
- The intent to publicize producers’ design for environment (DFE) initiatives.
- The proposed contents of the annual report, including the intention to publish the amount of material collected on a regional level where possible. This helps regional districts calculate their progress towards waste reduction targets, which, in the GVRD’s case, must be reported to the province each year.
- The commitment to make the stewardship plan a public document.

To further refine the plan, we provide the following recommendations:

Local government responsibilities (section 11.5)
The term “appropriate reimbursement for services provided” is vague and raises the concern that local governments may not be sufficiently reimbursed for collecting end-of-life (EOL) electronics. The language should be clarified so that local governments are aware that they, just as the private sector, are entitled to negotiate full cost recovery with BC Electronics Stewardship (BCES). BCES is always free to select a different collection point if an agreement cannot be reached.
Processing and recycling (section 5.2)
The plan should include a commitment to ensure that EOL electronics flow into the stewardship program. During the public consultation session on September 13 in Surrey it was clear that there will be competition for EOL electronics; some of this competition may come from recyclers that may not meet the electronics recycling standard in the plan. BCES will have to be proactive to ensure that collection points and commercial generators understand best practices for EOL electronics management so that they choose to use the stewardship program even if they are approached by competitors for the material. This will protect the integrity of the stewardship program and, equally important, protect the interest of recyclers that have made the necessary investments to meet the electronics recycling standard.

Performance measurement (section 6)
BCES should consider waste composition studies to assess program performance. While one would not necessarily set targets based on waste composition studies given the data limitations, these studies provide the best possible estimates of how much product is being disposed in municipal solid waste, the frequency of disposal (i.e. number of samples containing product), and trends over time. The GVRD conducts a system-wide waste composition study every three years. We welcome BCES and other stewards to participate in our next waste composition study, tentatively scheduled for 2007. With more resources, the scope of the project could be increased to improve statistical accuracy.

Resources to be employed to deliver key messages (section 4.4)
The key messages should be provided to regional districts and municipalities to include on websites and garbage and recycling calendars. Informational brochures should be provided to all regional districts and municipalities to distribute to the public at municipal halls, transfer stations and recycling depots. Disposal and recycling facilities are primary contact points and all the relevant program information should be available to facility operators and users.

Advisory committee (section 3)
We support the continuation of an advisory committee. To ensure transparency, we recommend that BCES establish formal criteria for appointing stakeholder representatives to the committee.

Reuse strategy (section 12.1)
The current strategy relies on public education to encourage consumers to donate usable equipment to reuse organizations. However, the public will need guidance to identify organizations that reuse and recycle material in a manner that respects environmental management and worker health and safety. For this reason, we recommend that the plan include a commitment to develop a code of practice for reuse organizations similar to the vendor qualification standard that was developed for recyclers. This would strengthen the reuse component of the plan and help meet section (1) (c) (viii) Recycling Regulation which states that products should be managed in the order of preference in the pollution prevention hierarchy.

Products included (section 8)
We understand that the intention is to expand the program to new products once a successful program for designated televisions, computers and printers is in place. In keeping with the initiative of Electronics Product Stewardship Canada (EPSC) to develop this stewardship plan before electronics were added to the Recycling Regulation, we encourage you to include a commitment to begin investigating new product categories before the regulation is expanded. We estimate that some 30,000 tonnes of audio visual equipment, telephones and small appliances are disposed in our facilities each year; this is in addition to the disposal of 20,000 tonnes of electronics that are currently designated under the regulation. Expanding the program to other electronics, electrical equipment such as small appliances, and information technology would make the program consistent with the Waste Electrical and Electronic Equipment (WEEE) Directive in the European Union.

Packaging
Although not currently designated under the Recycling Regulation, we encourage the electronics industry to take a proactive stance by including a commitment in the plan to reduce and recycle the amount of packaging generated by its products, especially styrofoam. Producers should be rewarded for their packaging-related DFE initiatives by reporting these advances in the annual report.

Canada’s electronics industry should be commended for voluntarily establishing EPSC to develop a stewardship plan that was almost complete by the time electronics were added to the Recycling Regulation. EPSC has done
an excellent job of developing this plan in an open, transparent manner ever since it released its first position paper in 2002. The plan has evolved significantly over the years and we appreciate EPSC’s willingness to design a program that fits with BC’s policy framework for extended producer responsibility. We look forward to the launch of this program.

Sincerely,
Monica Kosmak, Policy Analyst
Utility Analysis & Environmental Management Division

CC:
   Dave Betts, President, Electronics Product Stewardship Canada
   Toivo Allas, Manager, Policy & Planning Department, GVRD
   Albert van Roodselaar, UA&EM Division Manager, GVRD
   Fred Nenninger, Regional Utility Planning Division Manager, GVRD
   Gavin Joyce, Chair, GVRD REAC Solid Waste Sub-committee
   Hu Wallis, Director, Environmental Quality Branch, Ministry of Environment
   Jared Wright, Union of BC Municipalities
   Raymond Gaudart, Acting Chair, Local Government Stewardship Council
   Alan Summers, Manager, Solid Waste Division, CRD
   Brock MacDonald, Executive Director, Recycling Council of British Columbia
   GVRD Municipal Waste Reduction Coordinators
Concerns Regarding
The Electronics Product Stewardship Plan

Submitted to Doug Merrier
Program Manager
Electronic Recycling
Encorp Pacific (Canada)

by

Roxy Whitham
Computer Hardware Technician
School District 73

Al. R. Green
Educator Emeritus
Thompson Rivers University

September 29, 2006

Introduction:

Based on more than a decade of experience in repairing, rebuilding and recycling e-waste (e-waste) in the interior of B.C., we share the following concerns regarding The Electronics Product Stewardship Plan.

In our view the Stewardship Plan is too restrictive in where and how the items for recycling will be collected and processed and also too restrictive in the number of items that will be recycled.

Sources of e-waste:

We believe that there are three different sources of e-waste, each with different items to be recycled. We see those sources as being (a) individual consumers, (b) corporate users, government agencies, and educational institutions, and (c) retail outlets and repair centers.

Individual consumers:

In this technological age many individuals have computers with many peripherals, television and radio receivers, VCRs, CD and DVD players, stereo systems, cell phones, digital cameras and other digital devices.

The Stewardship Plan indicates that only computers with peripherals including monitors and printers and television receivers will be collected by recycling depots. The Stewardship Plan does not consider the other items such as VCRs that individuals may recycle.

Corporate users, government agencies, educational institutions:

The Stewardship Plan does not consider the recycling needs of these organizations. They may have a large number of computer workstations and a large number of pieces of A-V equipment such as VCRs, overhead projectors, stereo systems, tape recorders, gaming machines, etc.

Retail outlets and repair centers:

The Stewardship Plan does not consider the needs of retail outlets or repair centers. Retailers and the repair centers that do warranty work for them often have a large stock of end of life (EOL) workstations which are uneconomical to repair, as well as a large number of faulty parts that includes computer hardware, A-V equipment, television and satellite receivers, stereo systems, CD and DVD players and other electronic devices from other sources such as the automotive industry.

Computer reuse and recycling:

While we have concerns about all e-waste, the rest of this submission will concern itself with reuse and recycling of computers and computer peripherals.
The flow chart and comments below show and explain how we believe the e-waste program should be structured to make optimum use of used computers.
Disposal plan:

Individuals and organizations:

We believe that individual consumers and corporate users, government agencies, educational institutions and similar organizations should determine if the computer to be recycled can be reused by asking the question “Does this computer have some future use?” (The Stewardship website could explain how to determine if the computer system has some value. We suggest that a computer that contains an Intel “Pentium III” or AMD “Athlon” CPU and a speed of 750 MHz or higher still have some use).

If the answer to the question is “no”, then the computer should be taken to a Recycling Depot. If the answer to the question is “yes”, then the computer should be taken to an Evaluation Center which is described below.

The whole concept of computer reuse relies on the existence of an evaluation centre that is capable of repairing or rebuilding large numbers of workstations and distributing them to educational institutions or charitable organizations for reuse. In order for a computer reuse/recycling program to be truly effective, the existence of regional evaluation centers that are readily accessible is paramount.

The Evaluation Center envisioned is similar to the Computers for Schools (CFS) centers currently in place throughout Canada. CFS is a government funded entity that has a well organized infrastructure.

The evaluation Center staff will ask the question “Does this computer have some future use?” If the system is useful it will have the drives reformatted, have an operating system installed and will be cleaned. It will then be distributed to a new user. If the entire system is not useful it will be “parted out” and the individual useful pieces will be used along with other pieces to build useful computer systems. If the parts are useless, they will be transported to the downstream processor.

(At this time CFS processes approximately 18,000 computer workstations a year and is able to place approximately 9,500 workstations in educational institutions. The remaining 8,500 workstations are not useful as is and have been disassembled to facilitate the repair of other units. The work of CFS results in about 306 tonnes of e-waste that is sent to downstream processors to be environmentally disposed of in accordance with e-waste stewardship guidelines).

Retail outlets and repair centers:

We believe that retailers and repair depots have technical staff able to determine the future use of computer parts. If they find that parts are not useful they should be able to bypass the recycling depot and send the e-waste directly to the downstream processor. We believe that, in keeping with the spirit of electronic stewardship, most retail outlets and repair centers would participate in a program that would allow them have their e-waste sent to a proper processing facility for disposal.

Other issues:

Funding:

It is our belief that since the proposed evaluation centers would be working to reuse computers and therefore reduce the amount of equipment going through the recycling depots, they should receive the same compensation as a depot for the EOL equipment they process. If we consider the evaluation center, a parallel, more detailed depot, the environmental fee assessed should be available to defer the costs of operating the evaluation centers. If the Environmental fee is only assessed on EOL equipment then there would be no worry of applying it to any single unit more than once. In fact if you follow a machine through the flowchart it is possible that a unit that passes through an evaluation center and is recycled to a school and then on to a final processing center, there may never be a point that has been assessed a part of the environmental levy. So as the plan stands it is possible that no one would be collecting the depot fees on 9,500 work stations that were recycled. The irony here is that these are the machines that have been handled the most.

We are aware that CFS is currently in jeopardy of losing its government funding. If funding is lost then all the CFS stations will close and unless there are readily available evaluation centers the 18,000 workstations
currently being processed by CFS will either go to recycling depots (where Encorp Pacific (Canada) will have to fill the void) or into landfills.

Transportation:

As well as providing transportation for equipment between recycling depots and downstream processors, there also needs to be a transportation system available to facilitate the movement of equipment between evaluation centers and end users or downstream processors. Transportation fees would need to be funded as above.

Respectfully submitted
September 29, 2006

Roxy Whitham
Computer Hardware Technician
School District 73
rwhitham@sd73.bc.ca

Alan R. Green
Educator Emeritus
Thompson Rivers University
greenj@tru.ca
Additional Comments from the Regional District of Bulkley – Nechako (RDBN):

September 29, 2006
Thank you for the opportunity to participate in the Electronic Waste Stewardship Plan public consultation meeting.

The RDBN is pleased to see legislation of an electronics stewardship being implemented throughout BC by August 2007. As electronics become more and more popular with government, business and the general public it is paramount that proper disposal and recycling of all electronics become accessible where ever one may be located in the province. Current and historic computers, televisions, and printers are a satisfactory start; however, the RDBN believes this should be expanded upon in the near future to include other items such as cell phones, MP3 players etc.

6.3 Other Performance Measures
Written surveys may be another means of collecting information as opposed to phone surveys.

6 Performance Measures
The regulation should aim higher 75% is unsatisfactory.

4. Public Education and Awareness
The importance of consumer awareness in rural / northern areas can not be stressed enough. People are not mandated to recycle here but a lot would like the opportunity to do so; however, they need the knowledge of what and where.

Submitted by,

Tanya Thomson
Environmental Services Assistant
Regional District of Bulkley – Nechako
RE: Comments on British Columbia Stewardship Plan for End-of-Life Electronics  
*Draft for Public Consultation (August 2006)*

Dear Mr. Merrier:

On behalf of Retail Council of Canada (RCC), and our members operating in British Columbia, we appreciate the opportunity to comment on the draft *British Columbia Stewardship Plan for End-of-Life Electronics*.

Retailers are not only the sellers of designated products but are also first importers and increasingly developing their own brands. As the vital link in the distribution chain that connects consumers and manufacturers, retailers have a significant stake in the development of stewardship programs. Currently, RCC’s members are active participants in over 30 such programs across the country, and will be called upon to expand their role as new ones are developed.

Indeed, retailers support the principles of waste diversion as a whole. RCC has been pleased to be part of the British Columbia Electronic Stewardship (BCES) Advisory Committee and looks forward to continuing to working together with other key stakeholders in creating a successful electronics stewardship program in the province.

The following represents the initial thoughts of retailers, which may be added to and/or refined as further discussion takes place.

*Collection*

RCC and its members understand the importance of ensuring that consumers have reasonable access to collection points, particularly in remote areas. An issue of concern, however, is that one method that is consistently proposed to achieve this objective is a return-to-retail collection system.

RCC has reviewed the issues arising if retail stores acted as collection points for used or leftover consumer products and packaging. These issues include:

- Lack of space to store used products;
- Need for renovations to accommodate returns (additional ventilation, closed rooms, racking etc.);
- Need to hire additional staff to handle incoming used products;
- Need for specialized staff training to handle incoming used products;
- Employee and customer health and safety associated with handling and storing used products;
- Store insurance coverage;
- Store fire code compliance;
- Store municipal by-law compliance;
- Administrative costs; and,
• Breach of lease provisions.

Accordingly, RCC and its members do not support any legislated or regulatory requirements that used or leftover consumer products and packaging be returned-to-retail.

Occasionally some retailers and their suppliers may operate specialized take-back events for used or leftover consumer products and RCC believes that any product stewardship program should recognize these voluntary programs and allow retailers the flexibility to operate them.

Section five of the draft plan states that “where desired by retailers, and operationally feasible, consumers may be able to return designated EOL electronics to selected retail stores either on a scheduled event or continuous basis” (page 11). We respectfully request that this be amended to: “On a voluntary basis, retailers and their suppliers will have the flexibility to operate specialized take back events for end-of-life electronics.” We believe this change more clearly reflects our member’s position that retailers may offer take-back programs on a voluntary basis.

Funding

The BCES program will be funded by an environmental handling fee and we are pleased that retailers will be permitted to show the fee at the point of sale (e.g., as a separate line item on the sales receipt); this approach is consistent with the practice in other jurisdictions.

The transparency of program costs (or “visible fees”) is a significant issue for our members. Retailers require the flexibility to cover recycling program costs in a manner that minimizes the financial and administrative impact on their business.

Section nine of the draft stewardship plan states that “as part of our continuous improvement program we will review methods to reward in the future, in the marketplace and in an economically and efficient manner, those producers making environmental investments including the option of eliminating visible fees” (page 14). While we support continuous improvement initiatives, we do not support eliminating visible fees from the program. As such, we respectfully request that this be deleted from the draft program plan.

RCC has analysed the consequences of hidden fees and identified a number of serious impacts on retailers both large and small:

• Retailers who lease their premises pay more rent: rent is based on gross sales, which increase as prices are increased to cover stewardship program costs. This is a particularly troubling concern for small, local retailers.
• Higher advertising costs are incurred for national or regional retailers who must produce separate production runs with province-specific pricing.
• Some national and regional retailers have information systems that are not easily (or simply cannot be) configured for higher prices in a given province for the same product.
• Product prices in the province may become inflated as a result of the mark-ups that occur along the supply chain.
• Some retailers lose customers to neighbouring jurisdictions where the advertised price of a product is lower because there is not an imbedded eco-fee.
• The program creates an un-level playing field for retailers within a province.

In addition to visibility of eco-fees, RCC and its members generally agree that there should be a standardized or flat fee per product category, as opposed to a negotiated fee. This is vital to program clarity and success. Moreover, with the same fees being charged by all retailers, a level playing field is established amongst industry.
Where possible, British Columbia should strive for consistency of fees with other programs, particularly those in adjacent provinces.

Transparency of costs provides retailers with the flexibility to cover recycling program costs in a manner that minimizes the financial and administrative impact on their business; it also provides an important opportunity to educate consumers about stewardship programs, and hence encourage their participation.

*Education and Awareness*

Product stewardship is a shared responsibility and waste diversion programs will only be successful if consumers are aware of the program and see the benefits of participation. Educating consumers on stewardship issues is a fundamental component of any stewardship program. As the touch point for both consumers and manufacturers, retailers are a vital link in the supply chain and are strategically well positioned to assist in educating and increasing awareness among consumers.

Section four of the draft stewardship plan outlines the plan’s public education and awareness strategy. Page eight of the plan states that "in-store point of purchase material and informational brochures" will be one of many resources employed to deliver information to ensure public knowledge and understanding of the program.

While RCC agrees that point-of-sale information should be made available to consumers, we believe such educational material should be prepared and provided to retailers by the program administrator; it should not be the responsibility of the steward. This will ensure that a uniform message is delivered to consumers and will assist with increasing compliance with the program. This approach is also consistent with existing stewardship programs in other provinces.

Furthermore, RCC recommends that the costs for the establishment and administration of the point-of-sale information should be the responsibility of the program administrator, and should be included in the overall cost of the program; which is consistent with other jurisdictions. For example, the Alberta Recycling Management Authority includes awareness and education costs in the environmental fee charged to consumers on the sale of designated materials. It should not be the responsibility of the individual steward to fund the costs for the establishment and administration of point-of-sale information on the stewardship program.

*Retail Representation*

As stated earlier, retailers have a significant stake in the development of effective stewardship programs. In addition to being sellers of designated products, RCC’s members are increasingly also product brand-owners themselves and are responsible for the end-of-life management of those products and packaging. Given the major role that retailers play in product stewardship, retail must be represented in the decision-making bodies.

Currently, RCC, or a retail representative, is represented on many stewardship boards across the country including Stewardship Ontario, Waste Diversion Ontario, Product Care Association, Tire Stewardship British Columbia and the Saskatchewan Waste Electronic Equipment Program board, among others.

Again, we would like to reiterate our appreciation for being involved with the BCES Advisory Committee, and look forward to being part of a stewardship board, once developed.
**Designated Products**

RCC supports that the program will commence with the list of products outlined in the regulation beginning with computers (including monitor and peripherals; excluding hand-held devices), desktop printers and televisions. The draft stewardship plan states that “additional or expanded descriptions of eligible products will be developed as technological change requires while adhering to all program principles.”

With respect to the process to include future products, we recommend that industry be given the authority to determine these decisions. While the government does have an important role to play with respect to monitoring success and ensuring accountability, we believe that it should be the stewardship board, once incorporated, who be given the responsibility to conduct consultations and set appropriate timetables for the introduction of new electronic products. This allows government to benefit from the knowledge and expertise of industry.

**Conclusion**

RCC and its members strongly support waste diversion and prides itself on being actively involved with the development and implementation of product stewardship programs across the country. Once again, thank you for the opportunity to comment on the draft *British Columbia Stewardship Plan for End-of-Life Electronics*. We look forward to working together to minimize the environmental impacts associated with used or leftover consumer products. If you require any further information or clarification, please do not hesitate to contact me at (416) 922-0553, extension 318.

Sincerely,

Rachel Kagan  
National Manager, Government Relations (Environment)

cc: BCES Advisory Committee  
RCC Environment Committee
Dear Mr. Merrier:

RE: DRAFT STEWARDSHIP PLAN FOR END-OF-LIFE ELECTRONICS

On behalf of the Union of British Columbia Municipalities (UBCM), I wish to thank you for the opportunity to comment on the draft stewardship plan for end-of-life electronics. UBCM has been an active proponent of the development of effective and efficient product stewardship programs within British Columbia. UBCM recognizes that product stewardship programs contribute to a cleaner environment, reduce local government waste management costs, and extend the life of the landfill sites run by local governments. In recent years, local governments have endorsed several resolutions calling on product brand-owners to implement industry product stewardship programs that ensure the social and environmentally responsible handling of end-of-life electronic products.

UBCM is pleased to see the development of a comprehensive and transparent stewardship plan which clearly corresponds to the Ministry of Environment’s business plan principles and the applicable Recycling Regulation criteria. In particular, UBCM positively notes the clear delineation of the roles and responsibilities of stakeholders within the program, and the clear acknowledgement that producers will bear the costs associated with the management of electronic waste. The following comments are designed to enhance the draft stewardship plan by stimulating consumer awareness and convenience, strengthening the measurement of the program’s effectiveness, and improving the diversion of product from local landfills.

Section 4 – Public Education and Awareness
UBCM commends the inclusion of a comprehensive public education and awareness campaign within the draft plan, and the commitment to assess public awareness after the commencement of the program. To bolster public awareness, UBCM recommends local governments be included as avenues for distributing educational brochures, posters, and newsletters, and that hyperlinks between local governments websites and the program be explored.

Section 5 – Collection, Processing and Recycling
In order to support consumer convenience and secure consumer participation in recycling programs, UBCM has always maintained that consumers should have the broadest choice of options and that competition within the collection of products should be the driving principle of a stewardship program. UBCM positively notes that the plan proposes a mixed competitive collection system, including return to retail, and that local governments are given the option of having their collection facilities participate in the e-waste program if they willingly consent and appropriate compensation terms have been agreed upon.

However, while the plan acknowledges a commitment to providing adequate coverage to urban and rural areas, the plan does not clearly articulate collection strategies for addressing the unique needs of rural areas. In particular, it may be advisable to identify within the plan strategies, such as mobile collection units, to ensure that smaller communities do not end up with stockpiled electronic waste. If the “special and roundup events” are envisioned as the...
tools for addressing electronic waste is small rural communities, then the plan should make this explicit.

Section 6 – Performance Measures
UBCM has consistently called upon stewardship programs to achieve a recovery rate of eighty-five percent (85%) or better. However, UBCM acknowledges the inherent difficulty in establishing a statistically valid and meaningful performance measurement and recovery rate for electronic waste at this time. In the absence of a set recovery rate, UBCM welcomes BCES commitment to demonstrating increases in volumes of obligated materials collected within the first years, the undertaking of a public awareness research project, and the other alternate performance measures identified within the plan. It looks forward to the potential development of a recovery rate measurement following the successful implementation of the program.

To further ensure an effective assessment of the program’s effectiveness, BCES should consider conducting waste audits to determine the extent of electronic waste within local landfills. It may also be advisable to conduct the proposed public awareness survey on an annual basis, and incorporate it as a key performance measure within the annual report.

Section 8 – Products Included
UBCM recognizes that BCES plans to expand the program beyond the designated product categories once the program has been successfully implemented. Local governments have passed numerous resolutions calling for all electronic products, including small and large appliances, to be included within a product stewardship program. As such, UBCM encourages BCES to expedite the process of identifying additional product categories for inclusion within the program so as to further reduce the electronic waste stream.

Section 11- Responsibilities and Obligations
UBCM recommends strengthening the existing language surrounding the terms of compensation for local government participation within the program. Specifically, the plan should make it explicit that local governments are entitled to negotiate full cost recovery contracts with BCES. This amendment is consistent with the principle of producers bearing the full costs of managing electronic waste.

Overall, UBCM commends the efforts of Electronics Product Stewardship Canada in developing a comprehensive, transparent and effective stewardship plan that should substantially increase the diversion of electronic waste from local landfills. UBCM appreciates both the opportunity to have participated on the BC Electronics Advisory Committee and to have had local government recommendations incorporated within previous draft versions of the stewardship plan. We look forward to the implementation of the plan, and the future expansion of the program to include all electronic waste.

Sincerely,

Jared Wright
Policy Analyst, Union of British Columbia Municipalities
September 29, 2006

Encorp Pacific (Canada)
206 – 2250 Boundary Road
Burnaby, BC
V5M 3Z3

Dear Sir or Madam:

Re: Consultation Feedback

On behalf of School District No. 67 (Okanagan Skaha), please accept this letter as our feedback regarding the draft Stewardship Plan for recycling electronics.

We understand that residents will be able to return their used electronic equipment to local depots; however, school districts and other public organizations will not be able to use the local depots and will be required to take their used equipment to a regional collection point.

This will incur additional costs for our school district in two areas: firstly, the cost of shipping the used equipment to a regional collection point, and secondly, the storage cost for storing our equipment until we have a sufficient amount for shipping.

We believe that since our school district will be required to pay the same environmental fee at the time of purchase, we should be able to dispose of the used equipment in the same manner as local residents and businesses at local depots without incurring additional costs of shipping and storage.

Yours truly,

R. Shongrunden
Assistant Secretary-Treasurer

RS:da

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"Working Together for Student Success"
APPENDIX C

EPSC RECYCLING VENDOR QUALIFICATION STANDARDS – SEE ATTACHED
MEMBERS OF THE INDUSTRY COUNCIL

Brian Archer – Western Canada Computer Distributor Society
Nick Aubry, Sony
Dave Betts, EPS Canada, Chair
Rebecca Brown, Dell
Christa Copeland, Best Buy
Sean DeVries, Panasonic
Frances Edmonds, Hewlett-Packard (Canada) Co.
Jay Illingworth, EPS Canada
Rachel Kagan, Retail Council of Canada
Cedric Tetzel – London Drugs
Garry Travers – IBM Canada
George Tung – Taknology (Canada) Inc.
APPENDIX E

MEMBERS OF THE B. C. MULTI STAKEHOLDER ADVISORY COUNCIL*

Tim Deschamps, Skeena Queen Charlotte Regional District
Raymond Gaudart, Kootenay Boundary Regional District
Brian Grant, Ministry of the Environment, BC
Monica Kosmak, Greater Vancouver Regional District
Brock MacDonald, Recycling Council of BC
Cindy Pearson, BC Technology Information Association
Carol Suhan, Central Okanagan
Jared Wright, Union of BC Municipalities

*Dave Betts of EPS Canada Chairs this committee
CORPORATE MEMBERS OF ELECTRONICS PRODUCT STEWARDSHIP CANADA (EPSC)

Apple
Best Buy
Brother
Canon
Dell
Hitachi
Hewlett-Packard (Canada) Co.
IBM
Lenovo
Lexmark
LG
Logitech
London Drugs
Microsoft
Mind Computers
Northern Micro
Panasonic
Philips Electronics
Samsung
Sharp
Sony
Toshiba
Thomson
ASSOCIATIONS AND ORGANIZATIONS

Electro-Federation Canada

Electro-Federation Canada (EFC) is a national, not-for-profit industry association. Together, its six councils represent over 300 member companies that manufacture, distribute, and service electrical, electronic, and telecommunications products, contributing over $50B to the Canadian economy.

Electronics Product Stewardship Canada

Electronics Product Stewardship Canada is a not for profit organization established by Canada’s leading information technology and electronics manufacturers to work with governments as end of life stewardship programs are considered.

Information Technology Association of Canada

ITAC is the voice of the Canadian information and communications technology industry. Together with its affiliated organizations across the country, the association represents 1300 companies in the information and communications technology (ICT) industry in all sectors including telecommunications and Internet services, ICT consulting services, hardware, microelectronics, software and electronic content. ITAC's network of companies accounts for more than 70 per cent of the 566,000 jobs, $130 billion in revenue, $5.2 billion in R&D investment, $20.7 billion in exports and $11.5 billion in capital expenditure that the sector contributes annually to the Canadian economy.

Retail Council of Canada

Founded in 1963, Retail Council of Canada is the Voice of Retail. RCC is a not-for-profit association representing more than 40,000 store fronts of all retail formats, including national and regional department stores, mass merchants, specialty chains, independent stores and online merchants.