



October 16, 2020

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

Dear Mr. Leblanc,

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

I am pleased to submit the updated Electronics Stewardship Program Plan that expires on February 2, 2021.

Thank you,
Karen Ulmanis
Program Director – EPRA NB

Cc: Gerard MacLellan, Executive Director, Atlantic Canada EPRA
Cliff Hacking, President and CEO, EPRA



End-of-Life Electronics Stewardship Program New Brunswick

Submitted: October 16, 2020

Submitted to: **Recycle New Brunswick (RNB)**

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

For the Period: **February 2, 2021 to December 31, 2023**

Contact: Karen Ulmanis

Program Director, Electronic Products Recycling Association New Brunswick

karen.ulmanis@epra.ca

Contents

Introduction	4
1. Program Principles	4
2. Management Structure of the Plan	5
3. Program Details	5
4. Program Funding	6
5. Program Summary	8
6. Collection, Transportation and Consolidation	9
7. Performance Measures	9
8. Audit Systems	10
9. Geographic and population coverage	10
10. Options For Unwanted Electronics	11
11. Reduce	12
12. Communication and Public Awareness	12
13. Storage	14
14. Standards and Procedures for Recyclers of Electronic Waste	15
Appendices	15
Appendix 1	16
Appendix 2 – Drop off locations by area	18

Introduction

Electronic Products Recycling Association (EPRA) is pleased to submit this Stewardship Program Plan for regulated end-of-life electronics (EOLE) in New Brunswick.

EPRA New Brunswick launched in March of 2017, as of 2020 we have expanded to over 75 drop-off locations throughout the province and have collected close to 2000 metric tonnes of EOLE since inception to October 2020. Looking forward, EPRA New Brunswick will continue to build public engagement and drive end-of-life electronics recycling throughout the province.

EPRA is incorporated to deliver regulated programs in all Canadian provinces. Canada's electronics industry created EPRA as the national not-for-profit entity chartered with improving the efficiency and effectiveness of Canada's industry-led and regulated electronics stewardship programs.

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

1. Program Principles

EPRA New Brunswick's stewardship program is:

- Consistent with industry's guiding principles for stewardship programs which include promotion of the Electronics Recycling Standard (ERS) and harmonization with other jurisdictions where and to the extent possible to create efficiencies;
- Open to all obligated stewards;
- Providing a level playing field that ensures fair competition;
- Achieving a high level of compliance and eliminating the potential for free-riders with the assistance of Recycle New Brunswick;
- Addressing the issue of orphan, historic, and imported products from companies without a New Brunswick or Canadian presence;
- Ensuring unwanted and end-of-life program materials are reused and recycled in a responsible manner, meeting all occupational health, safety and audit provisions of the Electronics Recycling Standard (ERS).
- Ensuring the program is delivered in an environmentally sound and economically efficient manner.
- Includes public transparency for financial and environmental reporting.

2. Management Structure of the Plan

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

- Dealing with Recycle NB.
- Dealing with the Department of Environment and Local Government.
- Establishing and maintaining a drop-off centre network for the program in New Brunswick.
- Establishing and maintaining the infrastructure for transportation of materials collected from the drop-off centre network.
- Over all day-to-day management of the collection and transportation network in New Brunswick.
- Promote and educate New Brunswick residents.

Recycle New Brunswick Electronic Industry Advisory Committee

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

3. Program Details

This section of the proposal details the EPRA support of the steward obligation and the collection, transport and consolidation services and monitoring activities carried out by EPRA and its contracted service providers.

EPRA New Brunswick endeavours to keep regulated electronic products from going to landfill, but also from illegal export through the collection and recycling of unwanted products at their end-of-life. Recovered materials are put back into the manufacturing supply chain so that fewer virgin resources are required. These benefits are emphasized in the communications and public awareness investments which encourages participation in the program.

EPRA encourages the safe and environmentally responsible reuse and refurbishing of electronic devices. In addition to encouraging New Brunswick residents to consider reuse options prior to recycling their devices, EPRA continues to work closely with Computers for Schools New Brunswick (CFS-NB) as they look to attain certification under the Electronics Reuse & Refurbishing Program.

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

The *New Brunswick Clean Environment Act*, Designated Materials Regulation requires that brand owners register with the Board (Recycle New Brunswick) directly. As the subsequent

agent for brand owners, EPRA NB will request all EPRA registrants to be sure they fulfill this regulatory requirement between themselves and RNB.

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

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

4. Program Funding

Environmental Handling Fee (EHF)

The program is funded by an Environmental Handling Fee (EHF) that is levied on sales of new products listed under the Designated Materials Regulation. The EHF allows all New Brunswickers to drop-off regulated EOL electronic products at designated drop-off sites at no charge with the assurance that these items will be responsibly recycled.

The EHF for each product designated by regulation reflects the true cost of managing that product. The EHF provides sustainable funding for collection, handling, consolidation, transportation, recycling, communications, public awareness, compliance/administration, and environmental audits.

Setting the EHF

The environmental handling fee is set by product category. EPRA undertakes regular financial reporting to monitor revenue generated by the program per category and to ensure that funds are sufficient to fund all of the program activities identified in Section 6 of this report. To ensure long-term sustainability, the program is developing a contingency reserve in the event that collection and recycling costs exceed the funds available. This can happen in times of economic downturn or other unforeseen events, nevertheless requiring an uninterrupted, responsible electronics recycling service to continue. The contingency reserve is planned to be roughly twelve months (12) of operating costs. The EPRA New Brunswick program shall continue to be audited annually by an independent external auditor.

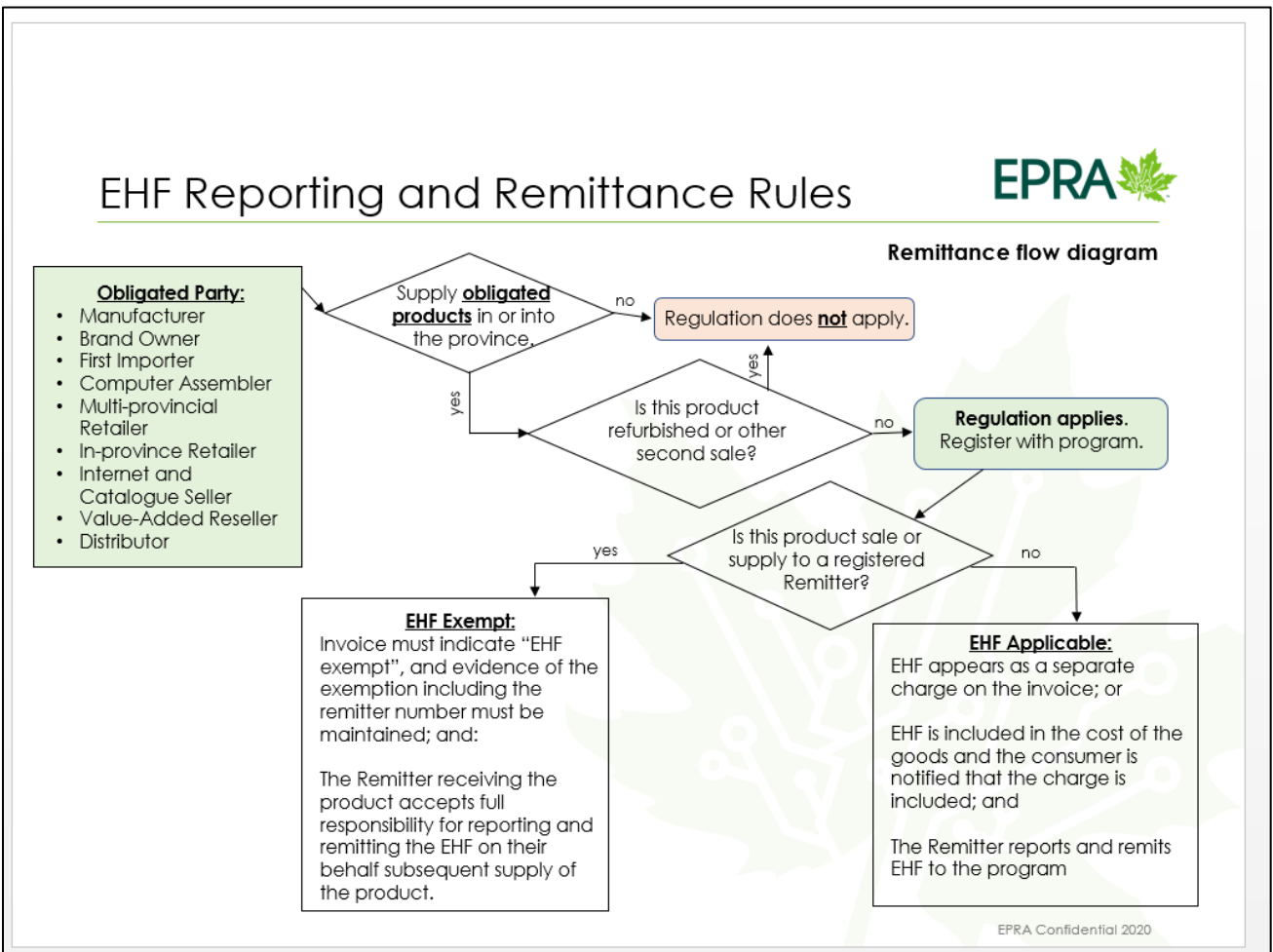
The reserve represents the accumulated surplus or deficit of the Program from inception and is necessary to ensure the program is not destabilized due to increases in

operational costs. In the event that the reserve exceeds or falls short of the plan, EPRA will consider making adjustments to the EHF rates.

EHF Reporting & Remittance

Obligated brand owners, also referred to as stewards, registered under the EPRA plan remit Environmental Handling Fees monthly to EPRA for their previous month's net sales (total sales less returns) or less frequently if they meet our small remitter provisions.

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



5. Program Summary

This document provides our Electronic Stewardship Program Plan to divert regulated unwanted and end-of-life electronics (EOLE) from landfill, as required by the Designated Materials Regulations under the Clean Environment Act.

As per Section 50.39(1) of the Regulations, EPRA is submitting this stewardship plan renewal. The Regulations require the following information in program Plans:

50.36 An electronic products stewardship plan shall contain the following:

(a) a plan for the collection, transportation, storage, reuse and recycling of electronic waste in the Province, including the electronic waste of other brand owners;

(b) information on the expected number of units or weight of electronic waste to be collected, reused, refurbished, recycled or recovered, as well as the expected associated costs;

(c) information with respect to : (i) return facilities to be used by consumers, (ii) adherence to established vendor qualification standards;

(d) information on the population and geographic area to be served;

(e) a plan for the provision of services to remote or rural areas, if applicable;

(f) a plan for the management of electronic waste in adherence to the following order of preference: (i) reuse; (ii) recycle; (iii) recovery of energy; and (iv) disposal in compliance with the Act;

(g) a description of the efforts being made by the brand owner to redesign electronic products to improve reusability and recyclability;

(h) a communications plan for informing consumers of the brand owner's electronic products stewardship plan, including the consumer's reasonable and free access to return facilities;

(i) the location of any long-term storage, containment or final treatment and processing facilities for electronic waste;

(j) a description of how electronic waste will be managed in a manner that employs environmental, human health and safety standards that meet or exceed applicable laws; and

(k) a plan for the elimination or reduction of the environmental impacts of electronic waste

6. Collection, Transportation and Consolidation

Regulatory Requirement

(a) a plan for the collection, transportation, storage, reuse and recycling of electronic waste in the Province, including the electronic waste of other brand owners;

The EPRA New Brunswick program collects designated program materials in all areas of the province.

New Brunswickers now have access to a network of drop-off sites that provide adequate, appropriate and convenient free of charge drop-off service to the residential and business sectors. EPRA is committed to continue to transport the collected materials in a safe and efficient manner. To ensure that EPRA approved drop off locations, transporters and processors adhere to the following minimum standards of EPRA.

1. Safe and secure location of end-of-life electronics at all times.
2. Continuing education of all current and new staff members.
3. Agree to unscheduled visits and audits by EPRA staff.
4. Adhere and uphold all sections in the EPRA Agreement.

Any breach of these minimum standards or any others as outlined in the EPRA New Brunswick drop-off location Agreement could result in the termination of the agreement between the service provider and EPRA,

EPRA New Brunswick will continue to ensure that the network of drop-off sites is adequate, appropriate and convenient:

- Drop-off sites shall be strategically located to ensure that the majority of New Brunswick residents are served.
Refer to [Appendix 2](#)
- All drop-off sites shall be open a minimum of 30 hours per week, including four (4) hours on Saturday (except statutory or civic holidays) or as approved by EPRA.
- All drop-off sites shall have a sufficient floor space to accommodate the safe and efficient handling and storage of program materials accepted from the general public and other sectors;
- All drop-off sites shall accommodate scheduled drop-offs of large quantities of program materials from New Brunswick residents.

7. Performance Measures

Regulatory Requirement

(b) information on the expected number of units or weight of electronic waste to be collected, reused, refurbished, recycled or recovered, as well as the expected associated costs;

Commencing in 2021, EPRA NB Annual Report 2020 will include the following performance measures with agreed upon targets:

Performance Measures	2020 Targets
Tonnage	1000 MT
Recovery Rates	41%*
Awareness	70%
Accessibility	93%

*Recovery rate model is evolving. NB first full year of put on market units was 2018, very recent in the life of electronic products.

Due to the rapid changes in the electronics recycling landscape, EPRA has committed to review previously approved targets prior to each year and report annually.

8. Audit Systems

Regulatory Requirement

(c) information with respect to:

- (i) return facilities to be used by consumers,**
- (ii) adherence to established vendor qualification standards;**

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

[Recycler Qualification Program 2015](#)

[Electronics Recycling Standard 2015](#)

Please refer to [Appendix 1](#)

9. Geographic and population coverage

Regulatory Requirement

(d) information on the population and geographic area to be served;

(e) a plan for the provision of services to remote or rural areas, if applicable;

EPRA will conduct regular reviews to ensure the network meets the needs of New Brunswick residents. A regular mapping exercise will be commissioned by EPRA which will keep actual versus targeted accessibility measurements current and to identify any service gaps. EPRA will use current Census data from Statistics Canada to understand the population distribution of New Brunswick residents, and will apply a convenience factor analysis.

The collection of end-of-life electronics regardless of geographic location is done on a weekly basis and then consolidated at a center in Grand Falls. From here they are sent on to one of our approved processing centers on a weekly basis.

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

EPRA NB has developed and will maintain an Accessibility coverage of minimum 60 drop off locations providing minimum 93% accessibility based on:

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

In the event accessibility coverage drops significantly, EPRA NB will:

- Add, where practical; drop off location in areas that require coverage.
- If it is not possible to open a drop off location in the identified area, EPRA will work with the community to find alternative recycling options for residents.

10. Options For Unwanted Electronics

Regulatory Requirement

(f) a plan for the management of electronic waste in adherence to the following order of preference:

- (i) reuse;**
- (ii) recycle;**
- (iii) recovery of energy; and**
- (iv) disposal in compliance with the Act;**

Reuse: Reusing unwanted electronic products will be promoted through the communications and public awareness program as the first option where markets and opportunities for reuse in-province exist. For New Brunswick residents considering this option, caution should be exercised and particularly with respect to protection of personal information. Obligated products that are re-used or refurbished will not attract an EHF

EPRA has established the Electronics Reuse & Refurbishing Program (ERRP - <https://rqp.ca/wp-content/uploads/2016/12/2.-Electronics-Reuse-and-Refurbishing-Standard-ERRS-2016-16.12.29.pdf>) to enable the safe and environmentally responsible reuse and refurbishing of electronics. By qualifying not-for-profit and charitable entities who meet the criteria outlined in the program, donors gain assurance that products reused through these organizations will be handled in a responsible manner. EPRA has worked closely with Computers for Success Canada (CFSC), locally known as Computers for School NB, to help them attain their ERRP certification.

Recycle: Recycling or processing of unwanted and end-of-life electronics will be promoted as the final option. Recycling, which diverts electronic waste from landfills and illegal export, typically involves some form of “primary” or initial processing, which may include dismantling and sorting of material by hand or by more elaborate mechanical means. Further manual or mechanical separation of materials by another vendor or vendors is considered “downstream” processing. Material flows will be tracked to their “point of final processing”, i.e. where they are altered into a new product or state or, for unrecyclable hazardous materials, to their point of disposal, i.e., where they are disposed of in an environmentally sound manner.

Disposal: EPRA's utilization of the Electronic Recycling Standard (ERS) ensures the majority of materials resulting from the processing of regulated end-of-life electronics are responsibly recycled and put back into the supply chain. However, there will be selected materials for which there is no viable option for recycling. An example would be wood waste from older television consoles. For these materials, EPRA will require that processors follow established guidelines.

11. Reduce

Regulatory Requirement

(g) a description of the efforts being made by the brand owner to redesign electronic products to improve reusability and recyclability;

Regulatory Requirement

(k) a plan for the elimination or reduction of the environmental impacts of electronic waste.

EPRA founder, Electronics Product Stewardship Canada (EPSC) represents major electronics and IT equipment brand owners in Canada on sustainability issues. EPSC issues its Design for Environment (DfE) Report (the 2020 edition is available [HERE](#), which highlights the industry's progress related to designing environmentally-conscious products, along with the many technological advances that are creating change in electronics design.)

12. Communication and Public Awareness

Regulatory Requirement

(h) a communications plan for informing consumers of the brand owner's electronic products stewardship plan, including the consumer's reasonable and free access to return facilities;

Communication and Public Awareness:

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

EPRA/Recycle My Electronics is responsible for safe, secure recycling of electronics. Recycle My Electronics is EPRA's award-winning, consumer-facing awareness program that promotes the importance of recycling end-of-life electronics (EOLE), as well as the ease and accessibility of doing so. Recycle My Electronics communicates to national and local audiences the significance of e-waste recycling and the importance of recovering valuable resources in a safe, secure and environmentally sound manner.

Communication Goals:

- Grow program awareness in the province of New Brunswick.
- Communicate to all audiences about the importance of recycling end-of-life electronics (EOLE) and recycling through the EPRA/Recycle My Electronics program.
- Provide EPRA drop-off locations in New Brunswick with communication materials that help consumers and business understand what and where to recycle end-of-life electronics.
- Ensure drop-off locations are being well informed regarding electronic products included in the program and provide accurate information to customers.
- EPRA will supply a communications plan on an annual basis to Recycle NB during the term of this management plan.

The communication plan may include:

1. List of media outlets (Bell Media, CBC, etc)
2. Markets where the campaigns were run (both French and English)
3. Media types used (radio, print, digital, various)
4. Estimated impressions made
5. Timing for any campaigns being run
6. Examples of all marketing and communication materials to be used across each format

EPRA NB will update Recycle NB if any changes are made to our strategy during the year.

- Consistent with the Regulation any educational and consumer materials will be submitted to Recycle NB thirty (30) days before release.

- EPRA NB will follow Recycle NB “Corporate Identity and Brand Standards Manual”

Integrated Campaigns: EPRA/Recycle My Electronics integrated promotional and education campaigns are amplified during strategic campaign frames, such as Earth Week and Waste Reduction Week in Canada. During these timeframes, media interviews and strong digital strategy compliments messaging, keeping the importance of recycling top-of-mind. Websites and integrated campaigns are English and French. EPRA/Recycle My Electronics offers an online learning hub, geared to young Canadians and educators.

Ops Communications: EPRA/Recycle My Electronics continues to extend reach and program awareness by outfitting collection sites with signs and information. EPRA/Recycle My Electronics offers curbside rejection stickers to allow haulers to tag and leave electronic waste at the curb.

Steward Support and Point-of-Sale Materials: EPRA/Recycle My Electronics offer a toll-free, bilingual call-centre will continue to accommodate inquiries from residents and stakeholders of New Brunswick. The call-centre helpline will continue to be an important communication tool, along with point of sale materials, webinars, company newsletters and product clarification updates to keep the steward audience engaged.

Responsive Communication Materials: EPRA/Recycle My Electronics will continue to seek feedback, to ensure stakeholders are receiving the communication and materials they require to do their part. Steward and program awareness polling will continue to be conducted on an annual basis to determine satisfaction in stewardship relations, and public perception and awareness of electronics recycling in the province.

13. Storage

Regulatory Requirement

(i) the location of any long-term storage, containment or final treatment and processing facilities for electronic waste;

End of life electronics are picked up at approved EPRA drop off centers on a weekly basis. They are then transported to a consolidation center where they are consolidated and transported on a weekly basis to an approved EPRA processor.

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

EPRA does not currently hold any end of life electronics in long-term storage, however should this change operationally, EPRA will advise RNB.

14. Standards and Procedures for Recyclers of Electronic Waste

(j) a description of how electronic waste will be managed in a manner that employs environmental, human health and safety standards that meet or exceed applicable laws; and

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

[Recycler Qualification Program 2015](#)

[Electronics Recycling Standard 2015](#)

[Electronics Reuse & Refurbishing Program 2016](#)

Appendices

Appendix 1

DROP OFF CENTER INSPECTION FORM

Drop of Center:		ID #:	
Date:		Inspector:	

PREMISES	YES	NO	CORRECTIVE ACTION
Access – entry, exit and parking adequate and hazard free			
Appearance – properly clear of debris/litter			
Building – structure appears in general good shape			
Signage – clearly displayed and in good condition			
Receiving area – adequate, hazard free.			
Storage area - secure			

EQUIPMENT AND PRODUCT	YES	NO	CORRECTIVE ACTION
Bags – are in good repair and adequate supply			
Shrink wrap – proper use and adequate supply			
Paper work – proper use and adequate supply			
Forklift/pallet jack – in good repair			
Bags – build level and full to the top			
Product collected – appears acceptable and intact(safe handling)			

Non program items – minimal or no evidence			
Product storage – sheltered and secure area			

Security – Check All that Apply	
Gated Perimeter Fence	
Lighting Motion Sensor	
Surveillance Cameras	
Alarm system	
Other	

Corrective

Action: _____

EPRA Signature: _____

Drop off center Signature _____

Appendix 2 – Drop off locations by area.

- Alladerville
- Baie Ste Anne
- Bath
- Bathurst
- Betrand
- Blackville
- Brighton
- Campbellton
- Cap Pele
- Caraquet
- Cocagne
- Dalhousie
- Dieppe
- Doaktown
- Edmunston
- Fail Isle
- Fredericton

Grand Bay
Grand Falls
Grand Manan
Hampton
Hartfield
Harvey
Hillsborough
McAdam
Memramcook
Minto
Miramichi
Moncton
Perth Andover
Petit Rocher
Plaster Rock
Quispamsis
Riviere Verte
Rogersville
Rothsay
Sackville
Saint Antoine
Saint John
Saint Quentin
Salisbury
Shippigan
St Francois
St George
St Leonard
St Louis to Kent
St Stephen
St. Basile
Sussex
Tracadie
Tracy
Woodstock