

April 7, 2021

Terry Greene  
EPRA – Newfoundland and Labrador  
P. O. Box 14133  
Manuels Stn Main  
Conception Bay South NL A1W 1A0

Dear Terry Greene;

**RE: Amendment to Newfoundland and Labrador Electronic Products Stewardship Plan as per Part V, Section 31.18 (f) (ix) of the *Waste Management Regulations***

The MMSB Board of Directors has approved the amended Electronic Products Stewardship Plan submitted by the Electronic Products Recycling Association (EPRA) in response to a change to the definition of electronic product. For your records, a copy of the approved stewardship plan is attached to this letter.

MMSB looks forward to continuing to work with EPRA towards the successful implementation of the electronics products recycling program outlined in this stewardship plan within 120 days from the date of this letter.

Sincerely,



Charles W. Bown  
CEO, MMSB

cc: Gary Ryan, MMSB  
Ashley Burke, MMSB  
Gerard Maclellan, EPRA  
Cliff Hacking, EPRA

Attach.



February 19, 2021

Ashley Burke  
Senior Policy Advisor  
Multi-Materials Stewardship Board  
St. John's, NL

Dear Ms. Burke:

**RE: Newfoundland and Labrador Electronic Product Definition**

We are in receipt of your correspondence of January 6, 2021 in which you indicate that products have been added to the definition of electronic products as per Part V, Section 31.18 (f) (ix) of the Waste Management Regulations, effective December 10, 2020.

In response to these changes EPRA is requesting approval of amendments to our program plan, which was approved on March 7, 2019. To fulfill compliance, EPRA-NL wishes to register as an agent for affected brand owners and, effective August 1, 2021, will collect the additional electronics products described in your correspondence, specifically:

- External storage drives and modems
- Electronic readers
- Video game devices (consoles, handheld devices and controllers)
- Navigation systems
- Counter-top microwave ovens

Attached to this request for registration is our existing approved Product Stewardship Plan with an addendum that includes enhancements to the plan to reflect actions which EPRA will take to ensure that we incorporate the new products list in our efforts.

We look forward to your reply and approval of the amendment to the Product Stewardship Plan in order to move forward in fulfilling the new requirements. Please let me know if you have any questions and thank you for the opportunity to work with you in providing safe and secure electronics recycling for residents of Newfoundland and Labrador.

Kind Regards,

Terry Greene  
Program Director, EPRA-NL



# Electronic Products Recycling Association

## Product Stewardship Plan 2019-2023

Newfoundland and Labrador

**REVISED February 19<sup>th</sup>, 2021**

Submitted to: **Multi-Materials Stewardship Board (MMSB)**

Submitted by: **Electronic Products Recycling Association-NL**

Contact: Terry Greene  
Program Director  
Electronic Products Recycling Association-NL  
[terry.greene@epra.ca](mailto:terry.greene@epra.ca)

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# End-of-Life Electronics Stewardship Plan

## Newfoundland and Labrador

### 1. Introduction

Electronic Products Recycling Association (EPRA) is pleased to submit this amended version of our approved End-of-Life Electronics (EOLE) Stewardship Program for Newfoundland and Labrador.

EPRA is a not-for-profit association which manages recycling programs in accordance with the regulations of provinces from coast to coast. 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.

### 2. Program Summary

This document outlines updates to our approved Electronic Products Stewardship Plan to divert designated end-of-life electronics (EOLE) from disposal, as required by the Multi-Materials Stewardship Board (MMSB) and in line with the Waste Management Regulations 2003, Environmental Protection Act (Newfoundland and Labrador Regulation 85/12).

EPRA has operated a successful EOLE recycling program in Newfoundland and Labrador since August, 2013 and has collected approximately 4400 metric tonnes of EOLE through our Drop-off Centres and Special Collection Events across the province.

Under our plan, regulated EOLE are not only diverted from landfills, but also from illegal export by collecting and recycling those unwanted products at their end-of-life.

An up-to-date listing of products covered by this plan can be found at:  
[www.recycleMYelectronics.ca/nl](http://www.recycleMYelectronics.ca/nl).

Since the original plan was submitted EPRA NL has added mobile cellular devices to the list of products covered by this plan.

The stewardship plan for Newfoundland and Labrador is based on a shared responsibility model where brand owners, retailers, consumers, and government all have a role to play.

**Brand owners** are responsible for providing a collection and recycling program that manages all EOLE identified in the Province's Waste Management Regulations.

**Stewards** are responsible for ensuring that an Environmental Handling Fee (EHF) is applied to new electronics designated in the Regulations and remitting the funds to the program administrator to cover all aspects of the program, including collection, transportation, recycling, public awareness and administration. EPRA audits stewards for compliance with all aspects of the agreement and program requirements.

**Consumers** purchasing electronics pay the EHF on these designated new electronics at the point-of-purchase. Consumers and businesses are able to drop-off their EOLE at a designated Drop-off Centre without charge and with assurance that these items will be recycled responsibly. The ICI sector also has the option of scheduling drop-offs for large quantities of EOLE

**Government**, through the MMSB, is responsible for enforcing the Regulations and ensuring full program compliance.

In addition to an annual administrative fee reflecting the costs incurred by MMSB as defined under Sections 31.30 and 31.32, MMSB may also offer services which would be beneficial to EPRA in delivering our commitments outlined in this Stewardship Plan. Should EPRA desire to secure the services of MMSB for an activity outside of those MMSB is obligated to carry out in fulfilling its duties under the Act and the regulations, this would be treated as a separate agreement and would be subject to our mutual agreement.

In the event that EPRA is found to be deficient in the delivery of its obligations as outlined in the regulations, MMSB will advise EPRA of such deficiencies and will provide EPRA reasonable timelines to resolve such deficiencies. Should the deficiencies remain unresolved such that MMSB must act to ensure EPRA's obligations are met, MMSB will levy fees upon EPRA to cover the costs of such actions. In these circumstances, MMSB will advise EPRA that fees are to be remitted in accordance with section 31.31 and will provide EPRA with an itemized listing of what actions were carried out, accompanied by their respective cost as part of the total fee.

### **3. Program Principles**

EPRA offers a product management program that:

- Supports 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;
- Is open to all obligated brand owners;
- Provides for a level playing field that ensures fair competition;
- Achieves a high level of compliance and eliminates the potential for free-riders;
- Adequately addresses the issue of orphan, historic, and imported products from companies without a presence in Newfoundland and Labrador;
- Ensure EOLE are recycled in a responsible manner, meeting all occupational health, safety and audit provisions of the Electronics Recycling Standard (ERS).

- Ensure the program is delivered in an environmentally sound and economically efficient manner; and
- Includes annual reporting of key metrics and program performance

#### **4. Management Structure of the Program**

All activities associated with the program are managed by the Program Director- Newfoundland and Labrador.

##### **4.1 EPRA Atlantic Advisory Committee**

EPRA has established an Advisory Committee to foster the exchange of information on our program and as a forum to discuss issues of local concern. Regulatory staff are invited to attend as observers and the committee meets twice per year.

##### **4.2 EPRA -Newfoundland and Labrador**

EPRA-NL is responsible for the management of the program and has the following responsibilities:

- Program promotion and public awareness;
- Ongoing assessment and analysis of program reach and convenience;
- Establishing and maintaining a Drop-off Centre network for the program in NL;
- Establishing and maintaining the infrastructure for transportation and consolidation of EOLE collected from the Drop-off Centre network;
- Day-to-day management of the collection and transportation network;

EPRA NL ensures as part of its program management that EOLE are managed in the following order of preference: reuse, recycling, recovery and disposal.

#### **5. Program Details**

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

##### **5.1 Collection, Transportation and Consolidation**

The EPRA NL Program Director, working in concert with local contracted services, will:

- Collect EOLE throughout the province;
- Use a network of least nineteen (19) Drop-off Centres to provide adequate, appropriate and convenient free of charge drop-off service to the residential and ICI sectors. These nineteen Drop-off Centres are as follows:

St. John's (3)	Bay Roberts	Hawkes Bay
Mount Pearl	Carbonear	Stephenville
Corner Brook	Gander	Port aux Basques
Conception Bay South	Grand Falls-Windsor	Happy Valley-Goose Bay
Marystown	Lewisporte	Wabush
Clarenville	Deer Lake	

- Implement an annual collection service in or near the following communities:

St. Joseph's	New Wes Valley
Placentia	Gambo
Bonavista	Pasadena
Twillingate	Burgeo
New World Island	Rocky Harbour
Fogo	St. Anthony
Glovertown	L'Anse au Loup
Robert's Arm	Mary's Harbour
Springdale	Cartwright
Botwood	St. Lewis
St. Alban's	Port Hope Simpson
Baie Verte	Charlottetown
La Scie	White Bay (Hampton)
Makkovik	Postville
Rigolet	Nain

EPRA NL will continue to work with the communities of Black Tickle and Hopedale with a view to determining any interest that exists in partnering on special collection events.

If we are able to find a partner in Black Tickle we will do a pilot collection event to assess the response by residents and will review the results with the MMSB. In Hopedale, we will make efforts to find a partner with whom we can arrange events during the duration of this plan. We will liaise with staff of the MMSB with regard to any assistance or support that is possible in finding opportunities in Hopedale and Black Tickle.

To ensure that the network of Drop-off Centres is adequate, appropriate and convenient, EPRA NL has established the following criteria for service:

- Drop-off Centres and Special Collection sites shall be strategically located to ensure that the majority of NL residents are served;
- All Drop-off Centres shall be open a minimum of 30 hours per week, or as approved by EPRA;
- All Drop-off Centres shall have a sufficient floor space to accommodate the safe and efficient handling and storage of EOLE accepted from the general public and ICI sector;
- All Drop-off Centres shall accommodate scheduled drop-offs of large quantities of EOLE from the ICI sector.

## **5.2 Monitoring of the EPRA Collection Network**

The following is a description of measures that are implemented to monitor the EPRA collection network in Newfoundland and Labrador.

EPRA NL provides a call centre service to residents and businesses, offering bilingual support and both phone and email services. Since program launch in 2013 the bulk of the enquiry activity is via email, consistent with trends in other jurisdictions and consumer comfort level with technology. The enquiry activity peaks with any program adjustment that occurs. The types and frequency of enquiries is tracked and reported in the annual reports provided by EPRA NL to the MMSB. The EPRA toll-free helpline is used as a primary tool to monitor public and steward feedback on both geographic/population coverage and customer service levels provided by our drop-off centre network. All calls and emails relating to these key elements are answered by our call center staff under the guidance of the EPRA NL Program Director.

The EPRA NL website ([www.recycleMYelectronics.ca/nl](http://www.recycleMYelectronics.ca/nl)) is the principal means by which residents of Newfoundland and Labrador access information about the program, especially information about Drop-off Depot locations, what can be recycled, Environmental Handling Fees and what happens to EOLE after they are dropped off at collections locations.

A summary of website enquiries as well as phone and email enquiries for the period from 2014 to 2018 is provided in Appendices A, B and C.

Regular review of the geographic/population coverage is conducted by EPRA to ensure that the collection network meets the needs of Newfoundland and Labrador residents and businesses. This includes an annual mapping exercise which defines actual versus targeted coverage measures and identifies any service gaps.

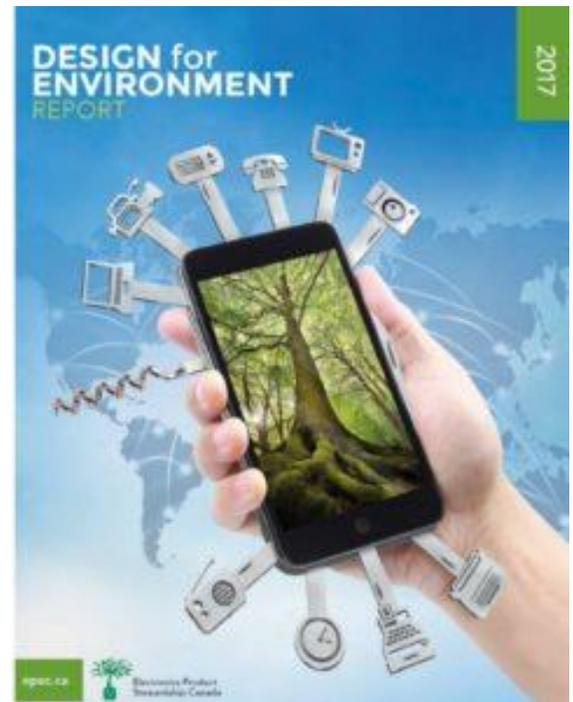
Data analysis also assists in assessing the effectiveness of the existing collection network. Detailed information on volumes of EOLE collected is recorded by operations staff and is reviewed periodically by the EPRA Program Director.

The EPRA NL Program Director regularly liaises with and/or visits Drop-off Centres to verify compliance with operating standards; provide additional training when necessary; and review recycling patterns of consumers.

### 5.3 Options for Unwanted Electronics

#### Listed in order of Preference:

**Reduce:** Electronics Product Stewardship Canada (EPSC) represents major electronics and IT equipment brand owners in Canada on sustainability issues. EPSC issues its *Design for Environment* (DfE) Report (the 2017 edition is now available here: [http://epsc.ca/wp-content/uploads/EPSC-2017-Design-for-Environment-Report\\_FINAL-EN.pdf](http://epsc.ca/wp-content/uploads/EPSC-2017-Design-for-Environment-Report_FINAL-EN.pdf)) which highlights the industry's progress related to design for the environment, along with the many technological advances that are creating change in electronics design. The electronics sector has made a shift to more mobile, multi-functional and light weight products. This dramatic shift to lighter weighted products is viewed as success in the goal of reducing what is placed upon the market and has dramatically impacted historical measurements. More and more electronics products have been freed from cables and plugs and become mobile. This trend has made a positive impact on the increased ability for today's electronics to be reused and refurbished. Each year's report builds on previous reports, with a focus on building sustainability into new product design. EPRA will report annually on DfE issues as provided through this research.



**Reuse:** Reusing electronic products is promoted by EPRA NL through the communications and public awareness program as the first option where markets and opportunities for reuse in-province exist. Some EPRA Stewards have initiatives for recovering useable electronics for refurbishment and resale. In addition there are market options available for consumers to resell (or gift) used electronics.

EPRA has undertaken measures to support the market for reuse and refurbishment of used electronics. EPRA has developed the Electronics Reuse and Refurbishment Program (ERRP) which is designed to foster safe and environmentally responsible reuse and refurbishing of electronics by recognizing reuse entities who meet the strict criteria outlined in the program. This provides donors with a level of assurance that electronics reused through these organizations will be handled in a responsible manner. EPRA NL has worked closely with Computers for Schools Newfoundland and Labrador (CFS NL) to attain ERRP certification. CFS NL is a charitable organization that delivers access to technology and digital skills for residents of Newfoundland and Labrador. EPRA NL encourages reuse and is pleased to have an innovative affiliation with Computers for Schools Newfoundland and Labrador (CFS NL).

**Recycle:** Recycling or processing of EOLE is promoted as the final option. Recycling, which diverts EOLE from landfill and illegal export, is a major focus of this program. Typically, recycling involves some form of "primary" or initial processing, which may

include dismantling and sorting of EOLE by hand or by more elaborate mechanical means. Further manual or mechanical separation of EOLE by another vendor or vendors is considered “downstream” processing. Material flows are 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.

EOLE are processed in accordance with the provisions of the Material Disposition Hierarchy, which is outlined in Table 1 which follows:

**Table 1: Material Disposition Hierarchy, and Acceptable Processes and Points of Final Disposition**

		Disposition Hierarchy			Acceptable Processes & Points of Final Disposition					
		Material Recovery Required	Energy recovery Permitted	Other disposition Permitted	Manual dismantling and material separation	Mechanical material separation	Extraction/purification/refinement	Smelting to reclaim metal	EFW Incineration (use of material as an energy)	Landfill
Focus Material	EOLE / Components	★			✓	✓	x	x	x	x
	Leaded Glass	★			✓	✓			x	x
	Mercury Lamps	★			x	✓		x	x	x
	Batteries	★			x	✓	x		x	x
	Circuit Boards	★			✓	✓	✓		x	x
Non-Focus Material	Ink / Toner Cartridges		★	★	✓	✓	x	x		
	Wires / Cables		★	★			x			
	Metals		★	★			x			
	Non-leaded Glass		★	★			x	x		
	Plastic		★	★			x	x		
	Wood		★	★			x	x		
	Leather, cotton and other fibres		★	★			x	x		

In accordance with the Disposition Hierarchy material recovery is always preferential over other disposition methods.

Only where other disposition methods are permitted, as indicated with an ‘★’, and where no material recovery options are viable, may materials be directed to energy recovery or land disposal.

x	Process/application not permitted
✓	Process/application permitted & subject to observational review
	Process/application permitted & subject to records review

## **5.4 Standards and Procedures for Recyclers of E-Waste**

To ensure that all EOLE 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 program. Additional information on the Recycler Qualification Process can be obtained at [www.rqp.ca](http://www.rqp.ca).

## **6. Program Funding**

### **6.1 The Environmental Handling Fee**

The program is funded by an Environmental Handling Fee (EHF) that is levied on new electronic product sales for product which is designated for recycling by the Newfoundland and Labrador Regulations. The EHF allows consumers and the ICI sector to drop-off EOLE at designated drop-off centres at no charge with the assurance that these items will be safely and securely recycled. The ICI sector has the option of scheduling drop-offs for large quantities of EOLE.

The EHF for each product designated by regulation reflects the true cost of managing that product. The EHF funds:

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

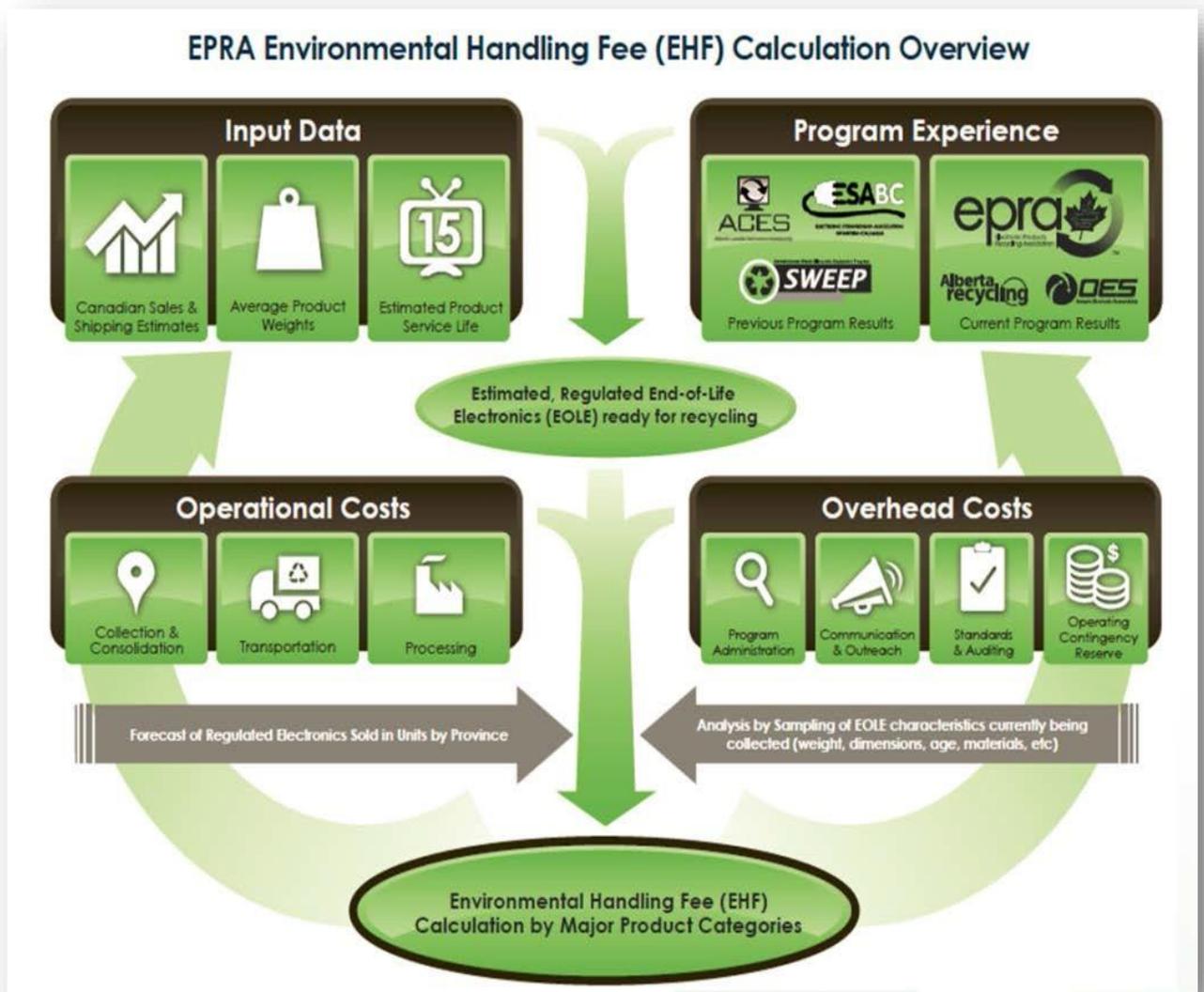
Following launch in 2013, the revenues and EHF remained high in 2014 until the program stabilized with a sufficient reserve. The guideline for sustainable operations is to hold 12- 18 months of program cost as a contingency reserve. The EPRA NL program has stayed within this range and has been able to reduce the EHF as the program has matured.

Marketing and communications are invested in and consistently exceed 12% of revenue. Administration costs have been reduced since the 2013 launch and reflect the investment by the program in a full-time Program Director. Direct costs, including collection, handling, transportation and storage as well as a local NL media spend and a Program Director investment are the majority of the NL spend. To contain costs, national platform services are allocated to each province based on actual usage. In this way, the NL program can be assured that the financials for the program are reflective of the operations in the province and managed effectively by the Program Director.

## 6.2 Setting the Environmental Handling Fee

Rather than a single flat fee set across all electronic products designated by the Newfoundland and Labrador Regulations, the fee is set by product category.

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

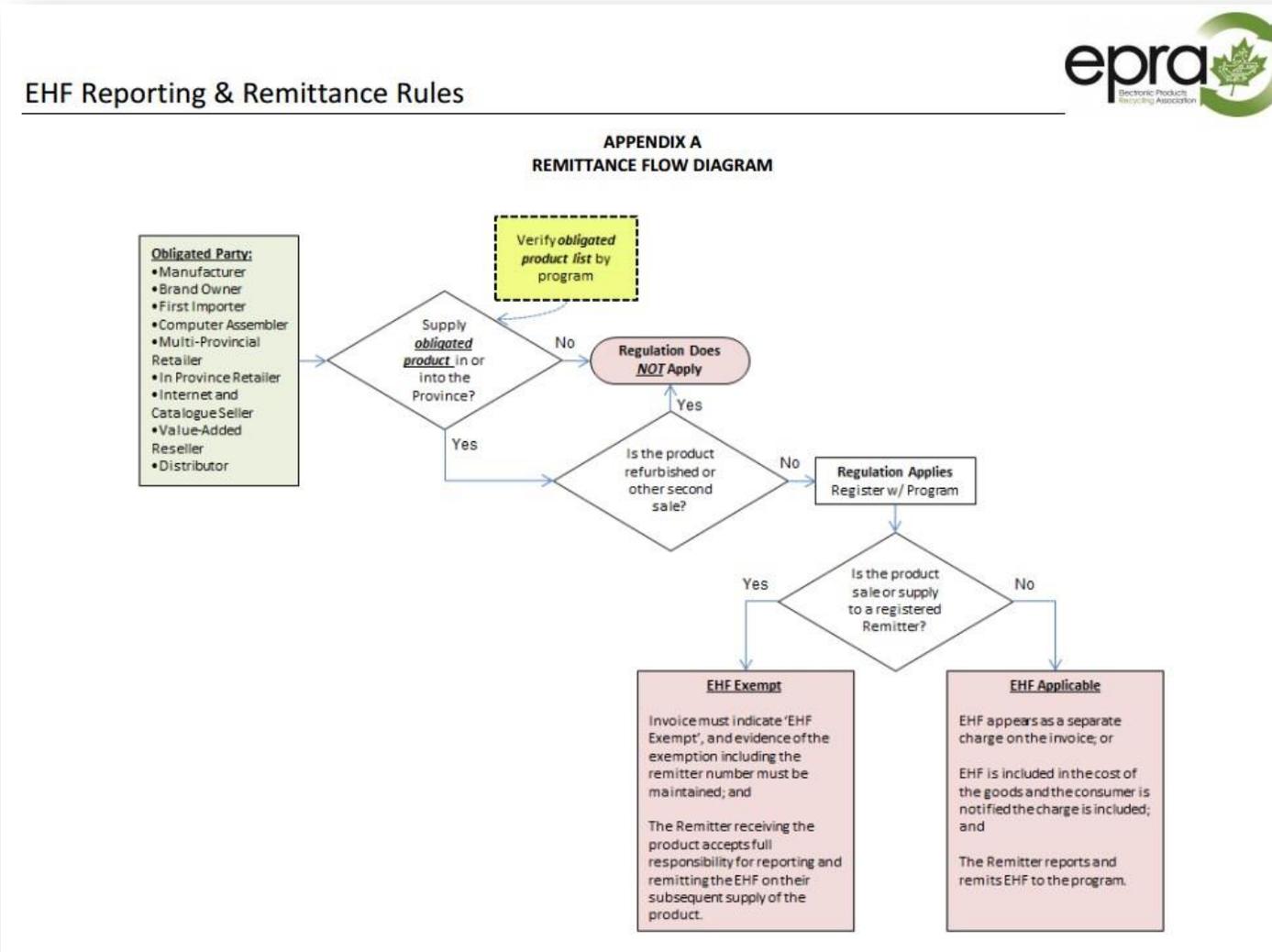


## 6.3 Funding Flow

Obligated brand owners registered under the EPRA plan remit Environmental Handling Fees monthly to EPRA for their previous month's net sales (total sales less returns). Because the product supply chain is complex and electronics are sold through a variety of channels, each registered brand owner is classified as either a

“Remitter” or “Pay-on-Purchase” (POP) member. A Remitter would usually be a larger entity (e.g. manufacturer, national retailer or distributor), but can also be a small, Newfoundland and Labrador-based reseller or retailer. The POP classification was introduced to minimize the administrative burden of monthly reporting on these smaller, local resellers and retailers. However, these smaller, local businesses may choose to be either a Remitter or POP member. This funding flow is outlined in **Figure 1** and ownership of the program fund is retained by EPRA.

**Figure 1: Steward Application of EHF**



## **7. Communication and Public Awareness**

### **7.1 Communication Goals**

The focus of the communications plan is two-fold: to continue to create awareness in Newfoundland and Labrador about the electronic stewardship program and to ensure that brand owners and retailers of regulated products have the opportunity to fulfill their obligations under the Regulations via membership in EPRA. The communications plan requires very clear messaging to all program stakeholders. The goals of EPRA's communication activities are to:

- Increase awareness and call to action among the public.
- Ensure residential and business consumers are aware of the EPRA Program, in particular the products that will be accepted in the Program, where to take them for safe and secure recycling and prompting active participation in recycling EOLE;
- Make sure that the electronic products brand owners and retailers of regulated products are aware of their obligations related to the EPRA Program in NL;
- Ensure EPRA Drop-off Centres continue to be well informed regarding electronic products included in the Program and can provide accurate information to consumers; and
- To minimize the level of incidental waste and clarify the roles of the various stakeholders regarding this issue (i.e. EPRA, businesses, residents and waste haulers).

Investment in marketing and awareness is evaluated annually and based on survey results, trends and emerging best practices. EPRA NL historically has invested more than 12% of revenues in messaging and program promotion. New tools are being adopted all the time, such as voice recognition for searching for drop off locations via a cell phone, and these over time may allow more reach with less spend, improving both effectiveness and efficiency of the NL program.

### **7.2 Communication Components**

All existing communication materials are appropriately informative to facilitate education and awareness of the EPRA NL Program for consumers and businesses. EPRA will continue to provide signage to the network of Drop-off Centres. Promotional material (for example brochures and tent cards) will be made available for electronic product retailers to order and to display at the point-of-sale. Examples of these can be viewed below:

## Point Of Sale: Brochures:

### What's Accepted

Electronics accepted at our drop-off locations

- Display Devices**  
Televisions and monitors, including various technologies such as Cathode Ray Tube (CRT), A&A-one, flat panel (LCD, LED and plasma) and rear projection.
- Non-Cellular Telephones**  
Includes corded and cordless telephones, as well as telephone answering machines.
- Home Audio/Video Systems**  
Includes VCR, DVD and CD players, digital cable and satellite equipment, speakers, amplifiers, receivers, data projectors and similar audio/video systems.
- Desktop Computers**  
Desktop computers including those acting as servers and all bundled keyboards, mice, cables and internal components.
- Portable Computers**  
Includes portable computers such as laptops, netbooks, notebooks and tablets.
- Computer Peripherals**  
Includes both wired and wireless manual input devices such as keyboards, mice and trackballs.
- Desktop Printers**  
Printers designed to reside on a work surface, including laser and LED, ink jet, dot matrix, thermal, dye sublimation and "multi-function" copy, scan, fax and print devices. Stand-alone desktop scanners and fax machines are also included in this category.
- Personal/Portable Audio/Video Systems**  
Includes docking speakers, portable stereos, portable CD players, portable audio recorders, tape/radio players, headphones, digital media (MP3) players, voice recorders, digital cameras and video cameras.
- Home Theatre In-A-Box (HTB) Systems**  
Includes pre-packaged disc player/speaker/amplifier systems for use with video or television display to create a home theatre experience.
- Vehicle Audio/Video Systems (aftermarket)**  
Includes amplifiers, equalizers, speakers and audio/video components.
- Cellular Devices and Pagers**  
Cellular phones, including those offering camera, video recording and/or audio functions, smartphones (cell-enabled); cell-enabled PDAs utilizing touch-screen technology; cell-enabled handheld devices.

When you bring your old, unusable electronics to Recycle My Electronics authorized drop-off locations, you're helping to:

- Keep old electronics out of landfills.
- Prevent e-waste from being illegally exported or handled by irresponsible recyclers.
- Recover and recycle resources that can be put back into the manufacturing supply chain.



RECYLE MY ELECTRONICS

To find out what and where to recycle, visit [recyclemyelectronics.ca/NL](http://recyclemyelectronics.ca/NL)

or call our helpline at 1-888-503-3201 or email [infoNL@recyclemyelectronics.ca](mailto:infoNL@recyclemyelectronics.ca)



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The future is in your hands. Don't let it go to waste.™

[recyclemyelectronics.ca/NL](http://recyclemyelectronics.ca/NL)



RECYLE MY ELECTRONICS

NEWFOUNDLAND AND LABRADOR

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### What We Do

To find a drop-off location near you, visit [recyclemyelectronics.ca/NL](http://recyclemyelectronics.ca/NL)

**About Electronic Products Recycling Association**

As a recognized industry-led not-for-profit organization, Electronic Products Recycling Association (EPRA) provides environmental compliance programs for manufacturers, distributors and retailers of electronics. EPRA is responsible for implementing and operating, on behalf of their stewards, a safe and secure program for the recovery and reclamation of end-of-life electronic products.

**Who are we?**

Recycle My Electronics is your go-to resource for electronics recycling. We're here to help you recycle your end-of-life electronic products and provide educational resources.

The Recycle My Electronics program safely diverts more than **17 million devices** from Canada's landfills and illegal export every year.

### Q&A

**Q: What is Electronic Products Recycling Association (EPRA) Newfoundland and Labrador?**

**A:** EPRA Newfoundland and Labrador is a not-for-profit industry-led organization that operates a government-approved end-of-life electronics recycling program throughout the province. Residents and businesses can drop off their unwanted electronics free of charge for safe, secure and responsible recycling at an EPRA Newfoundland and Labrador drop-off location.

**Q: Isn't it important to reuse before recycling?**

**A:** Absolutely. The EPRA Newfoundland and Labrador program is designed to manage end-of-life electronic products that have exhausted their reuse potential. If your electronic items are not at the end of their useful life, you are encouraged to explore reuse opportunities including donating them to family members, friends or authorized Reuse Organizations.

**Q: How does EPRA Newfoundland and Labrador ensure that electronics are recycled responsibly?**

**A:** EPRA is committed to recycling end-of-life electronic products collected through our network of drop-off locations in a responsible manner. EPRA only works with recyclers who have been verified under the national Electronics Recycling Standard (ERS) which was designed by the electronics industry to ensure that end-of-life electronics are managed in a safe and environmentally-sound manner. This means that all EPRA verified recyclers must be actively processing material that is entrusted to them by EPRA. Further, our Recycler Qualification Office (RQO) verifies the recyclers against the ERS requirements. This ensures that recyclers are maintaining appropriate environmental, health and safety controls and are properly handling all materials. For more information, visit [www.RQP.ca](http://www.RQP.ca)

**Q: How do I know my personal information will not be seen or stolen?**

**A:** Consumers and businesses are responsible for ensuring that all personal data is removed from their electronic devices, prior to bringing them to one of our drop-off locations. If you are unsure how to do this, contact the manufacturer for more information. While EPRA Newfoundland and Labrador requires that all of our recyclers protect data on end-of-life electronics from unauthorized access or theft, it is your obligation to protect your personal information. EPRA Newfoundland and Labrador does not accept liability for data or any other digital content that is left on electronic products collected at our drop-off locations.

**Q: How is the program funded?**

**A:** EPRA Newfoundland and Labrador is funded through Environmental Handling Fees (EHF) that are applied on the sale of all new electronic products. It's not a tax, nor is it a refundable deposit. The EHF is based on the cost to recycle end-of-life electronic products. All program revenues is used for the collection, transportation and responsible recycling of end-of-life electronics as well as program administration.

**Q: Where will my recycled electronics go?**

**A:** EPRA Newfoundland and Labrador manages end-of-life electronics according to the highest environmental standards at every stage of the recycling process. Once collected and sorted, items are sent to an EPRA approved recycling facility for dismantling and proper downstream management. All other materials are separated into different streams to recover metals, plastics, glass and natural resources so they can be processed into new products.

For more information, visit [recyclemyelectronics.ca/NL](http://recyclemyelectronics.ca/NL)

## Point Of Sale: Tent Cards:



In fall of 2017, EPRA successfully launched the new “Recycle My Electronics” Newfoundland and Labrador brand. Since then, EPRA has expanded efforts to help reach an ever greater audience through advertising on radio, in digital spaces, and in print. A combination of ad formats and targeting strategies will continue to be used to promote awareness and reach the Newfoundland and Labrador audience over the next 5 years via an integrated marketing plan – with region specific messaging about the importance of recycling electronics.

**Radio** is both an effective and efficient medium to build awareness and extend reach. Radio advertising focuses on the larger urban markets that have the most drop off locations. Stations that have the broadest radio signals are given priority in order to expand the message reach to rural areas, providing blanket market reach.

**Print** is included in both urban and rural markets as an additional media touch point to extend the reach of the Recycle My Electronics messaging. Historically, print has been considered an effective medium for brand message so we will continue to leverage it as a proven media choice.

**Online advertising** ads launched in 2018 (display, mobile and video). For 90% of the Newfoundland and Labrador audience, digital is the first preference when reading news publications. (Source: *statcas.ca*). Our online media buy includes programmatic ads which leverage our partners' data to determine the right time, place, site and person to whom we can serve the ad. The EPRA Communications plan also includes local news and weather sites to ensure that rural and urban populations are included in

the online targeting.

**Search** continues to maintain a position at the industry forefront with search engine marketing, maintaining a year-round optimization program and a website fully optimized for mobile browsing.

**Education** of youth will continue as a focus area for EPRA. The Online Learning Hub provides students, youth groups, educators and parents with interactive, engaging content that helps them learn about the importance of electronics recycling. It's been designed based on feedback from educators for hands-on learning in "bite size chunks of information" in the digital space – all in one easily accessible location, for use by students in the classroom and for independent learning. These classroom educational tools have been, and will continue to be, promoted through the Technical Educators Special Interest Council (TESIC) of the Newfoundland and Labrador Teachers Association (NLTA).

**Community Collection Events** are an effective means by which EPRA NL maintains awareness and collection activity and we will continue to host community collection events in communities throughout the province.

**Point of sale (POS) materials** are made available to Stewards in Newfoundland and Labrador. Retailers can order POS material through the [recycleMYelectronics.ca](http://recycleMYelectronics.ca) website or by calling our toll-free contact number.

**Steward Engagement** continues to be an important service. EPRA NL continues to maintain strong Steward Engagement. This includes a toll free service to answer questions, executive team webinars, and monthly product clarification and update newsletters.

The message of primary importance will be that all consumers can drop off EOLE free of charge at authorized EPRA NL Drop-off Centres with the assurance that they will be responsibly recycled.

EPRA NL recognizes that the waste management strategy in Newfoundland and Labrador is evolving, especially as it relates to provincial and regional legislative and procedural changes. EPRA will consider this evolution, including the adoption or enforcement of landfill bans, in its marketing and communications messaging.

Examples of our ads can be viewed below:

## Print Advertising

**RECYCLE MY ELECTRONICS**

The future is in your hands.  
Don't let it go to waste.™

To find out what and where to recycle, visit  
**recycleMYelectronics.ca/NL**

**WHAT CAN BE RECYCLED?**

Display Devices	Desktop Computers	Portable Computers	Computer Peripherals	Desktop Printers
Cellular/Non-Cellular Telephone Devices	Personal/Portable Audio/Video Systems	Home Theatre In-Rack (HTR) Systems	Home Audio/Video Systems	Vehicle Audio/Video Systems (aftermarket)

**epra**

Lobster Cove Head, Newfoundland

## Digital Advertising



640 x640



Big Box



Digital Billboard



Skyscraper 160



Skyscraper 120

Public opinion polling is conducted to determine awareness of EOLE recycling in the province and this information is outlined in EPRA's Annual Report. EPRA NL engages a third party polling company to conduct an annual program awareness survey with a panel of 800 residents of Newfoundland and Labrador. The polling company starts with a list of 1000 residents and applies that list until they achieve the 800 responses targeted. The quantitative research instrument allows for a margin of error for this study of +/-3.1%.

EPRA NL selects a third party polling vendor based on stringent quality assurance methods of data collection and storage, exceeding the norms set by WAPOR (The World Association for Public Opinion Research). These measures are applied at every stage of the project, from data collection to processing, through to analysis.

The EPRA NL website was completely revised in 2017 and will continue to be updated on an ongoing basis to reflect any future expansion of the program, or changes to any of the EHF's. It will continue to clearly outline all of the EOLE accepted for recycling, as well as offer a Drop-off Centre locator with all of the locations in the province.

EPRA has also developed two (2) videos on EOLE-recycling that are available for viewing and downloading on the EPRA NL website.

The first video is titled, "**What happens to end-of-life electronics?**" and it illustrates and explains to viewers how end-of-life electronics (EOLE) that are dropped off at an EPRA Drop-off Centre are recycled responsibly. This video is available to view at

<http://www.recycleMYelectronics.ca/nl/what-can-i-do/where-does-it-go/>.



The second video is titled, "**What is the EHF?**" and it explains what the EHF is and why it is charged. This video was developed to help consumers learn about the EHF and also to assist Retailers to train their staff on how to answer questions from consumers on the EHF. It can be viewed at:

<http://www.recyclemyelectronics.ca/nl/stewards/what-is-the-ehf-a-training-video/>.



The EPRA toll-free helpline service will continue to accommodate inquiries from Newfoundland and Labrador residents and other stakeholders and will continue to be an important communication tool. All calls are answered by EPRA call centre staff trained to answer NL- specific calls.

## **8. Audit Systems**

EPRA had 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.

### **8.1 Auditing of Brand Owners**

#### **Criteria for Audits**

Detailed audits of remitters (brand owners) will be performed on a regular basis to ensure both compliance and completeness in the reporting of revenue. Audit selection is a function of, but not limited to, materiality, any non-standard or unusual

behavior and random selection; and with the plan that all remitters are audited at some point within a 5 year period.

### **Audit Procedures**

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

### **8.2 Auditing of Recyclers**

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

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

All end-of-life electronics collected under the EPRA NL program are processed by recyclers that have been audited and approved under the Recycler Qualification Program (RQP). As part of this approval process, recyclers are required to also attain third party approval under the internationally recognized R2 Standard.

Through these two audit processes, the recyclers are subject to an annual on-site audit by a third party certification body to assess their conformance with the requirements of the R2 standard. They are also subject to an annual observational review conducted by the RQO of their site and processing operations.

Once materials are recovered through the recycling process, they are returned to a commodity grade material and sent to end markets to reenter the supply chain.

As per the R2 Standard, items defined as Focus Materials, which are items that contain hazardous substances such as mercury or lead, are required to be recovered for appropriate treatment of those materials. Focus materials are strictly prohibited from any landfill disposal or incineration applications.

Non-focus materials may not be directed to landfill disposal or incineration applications, unless no other reuse or recycling operations are viable.

### **8.3 Performance Measurements and Continuous Improvement**

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

#### Indicator

Operational	Total EOLE Collected (tonnes)
	Total EOLE Collected per Capita (kilograms)

	Total EOLE Collected by Waste Management Region
Financial	Total Program Costs per Tonne
Accessibility	Percent of Population Covered by Collection Sites Total Collection Sites Total Collection Events
Awareness	Percentage of Population Aware of the Program
Recycling	Percentage of Collected EOLE Recycled

Historically, a common metric for electronics recycling has been tonnage collected. However, electronics are getting lighter as the technology evolves. This is known as “light-weighting” and impacts all categories of electronics. The evolution of the television is a prime example of light-weighting as the old CRT console has given way to the thinner and lighter LED and LCD type screens. The challenge surrounding light-weighting is in determining effective performance measurements when it comes to collection of EOLE, given that overall product weight is decreasing.

### **Performance Targets-EOLE Recovery**

Several factors impact the ability to project collections volume and set performance targets during the duration of this program plan:

- Light-weighting (as described above)
- The willingness of NL residents and businesses to respond to our “call to action” and bring their EOLE to an EPRA collection point or event
- The relative age and weight profile of EOLE that are currently stored by NL residents and businesses
- The degree to which residents and businesses choose to donate their electronics for “re-use” rather than recycling through our Drop-off Centres
- The degree to which residents and businesses choose to drop off their EOLE to other organizations who are collecting in the province
- The degree of enforcement of landfill bans that are in effect; and the degree to which further landfill bans will come into effect in NL

EPRA NL will strive to recover 1000 metric tonnes of end-of-life electronics during each year covered by this Product Stewardship Plan. EPRA NL will work with the MMSB to review previous year’s results and set annual targets for the next year during each year covered by this Plan. (See Section 8.4 for more detail on annual review processes).

## **Actions to Achieve Performance Targets:**

Messaging regarding the importance of recycling and positive recycling behaviours by residents and businesses will continue through the duration of this Program Plan and to that end, awareness and accessibility are key to optimal program results.

### **Program Awareness**

Over the 5 years that this Program Plan is in effect EPRA NL will continue to focus on program awareness and the importance of recycling electronics. Messaging will include call to action as well as education on the value of natural resources and accessibility through convenient drop off locations. In our marketing plans during the life of this Program Plan EPRA NL will focus much of its communications on the reusable resources inside end-of-life electronics and the importance of recovering and putting them back into the manufacturing stream. This message will be taken directly to the public through radio, print and digital campaigns as well as community collection events. Messaging themes will include the following:

- **Natural resource recovery:** Electronics are filled with re-usable natural resources, including a variety of precious metals such as gold, silver, copper and palladium, as well as plastics and glass. By recycling these electronics, resources can be recovered and put back into the manufacturing supply chain for new products. In the five years of local operations, EPRA NL has been directly responsible for the diversion of over 4,400 metric tonnes of EOLE (televisions, tablets, computers, etc.) from landfill. In addition to being good for the earth, recycling also generates traffic and revenue for collection sites across the province.
- **Easily accessible drop-off locations.** 96% of the population of Newfoundland and Labrador lives within 45 minutes for rural residents and 30 minutes for urban residents, of an EPRA drop-off location. To make it even easier to recycle electronics, all public facing messaging asks consumers to visit the [recycleMYelectronics.ca](http://recycleMYelectronics.ca) website to enter their postal code and effectively find their nearest EPRA drop-off location as well as special collection events.

The goal is to maintain program awareness  $\geq 70\%$ , with the aim of increased participation in EOLE recycling.

### **Program Accessibility**

The goal is to maintain accessibility  $\geq 94\%$ . EPRA has established a network of drop off locations that is two and a half times the number which has been defined in our Program Plan. At the end of 2018 EPRA has 59 drop off locations.

Whenever we can find new opportunities to expand our collections network during the duration of this Program Plan we will do so.

In addition to the permanent drop off location network, we will work to achieve recovery results by sponsoring special collection events (as described elsewhere in this Plan).

We will work with the ICI sector to encourage recycling at office buildings, condo buildings and apartment complexes.

We will continue to build relationships and possibly collections partnerships with charities, including Diabetes Canada and the Salvation Army (Thrift Shops) as well as not-for profit entities such as ReStore (Habitat for Humanity), all of whom may be sources of publicly-donated, but not reusable EOLE.

### **Government and Community Outreach**

During the duration of this plan EPRA NL will work with municipalities to ensure awareness of, and support for, our program. Where feasible we will ensure that municipalities have links to the [RecycleMYelectronics.ca/nl](http://RecycleMYelectronics.ca/nl) website, either on their town website and/or Facebook page; and that they encourage residents to divert their EOLE to our collections locations and special collection events.

EPRA NL will participate in relevant trade shows to create awareness of our program.

### **Retail Collateral**

Information related to EOLE recycling; the RecycleMYelectronics brand; and drop-off locations will be made available to retailers/stewards to create awareness of the program and encourage residents of the Province to recycle their electronics.

### **Performance Target – Recycling**

The target for recycling is impacted by the types of EOLE which are collected and the degree to which the EOLE contain material which cannot be recycled. The recycling target for the duration of this plan is  $\geq 95\%$ .

## **8.4 Annual Review of Program Performance**

EPRA NL will arrange to meet with the MMSB in the first quarter of each year covered by this Plan, to review the previous year's results with regard to consumer access; consumer awareness; and amount of EOLE collected.

This annual review will allow EPRA to discuss with the MMSB the factors that influenced results in the previous year; the data which is available relating to the previous year's results; and changes in process that can be made to facilitate improvements in the current year. This review will also allow EPRA NL to seek creative ideas from the MMSB and identify opportunities for collaboration on these ideas between the MMSB and EPRA. The results of this review would then drive mutually-agreed performance targets for the current year.

The criteria for this annual review will be identified through discussion, and could include the following:

- Total tonnage collected and forward-looking trends on tonnage
- Assessment of need for alternate collection locations;
- Review of Special Collection Events;
- Review of consumer awareness and messaging;
- Review of data elements included in the EPRA NL annual report
- Areas for improvement as it relates to landfill bans and/or landfill ban enforcement;

## **9.0 Reporting**

### **9.1 Summary Reporting**

EPRA NL will ensure that key results are provided in annual reports which are submitted over the five years covered by this Program Plan and will also provide a data summary for previous years in order to facilitate ease-of-viewing and cross-referencing of historical data. A table format will be provided in annual reports, summarizing the following data points:

- Total weight collected
- Weight collected per capita
- Consumer Access
- Consumer Awareness
- Number of Drop-off locations
- Number of Collection Events
- Recycling Rate

A summary table of these data points and key results for the period from 2013-2017 is included in Appendix D.

### **9.2 Detailed Reporting**

As part of its Annual Report to the MMSB, EPRA NL will provide a summary of the total weight of EOLE collected in each of the twelve waste management regions; as well as the weight of EOLE collected at each collection event.

## **10.0 Local Economic Benefit**

EPRA NL aims to maximize local participation and economic impact of the recycling program. EPRA NL has invested in a full-time Program Director. Marketing spend is optimized so that the majority of the program revenues are spent on local media and communication services.

EPRA NL supports 50+ drop-off locations and pays a highly competitive collection rate that supports local hiring and employment. EPRA's efficient processes and prompt payment allow quick return of funds to the local organizations participating in the collection, transportation and sorting of electronics. In addition to supporting the local economy in support of collection enterprises and transportation entities, EPRA also contributes financially to local communities by partnering with schools and volunteer fire departments in the organization of community collection events.

Training on new tools and processes is an additional area of investment by EPRA, resulting in the Program Director and support personnel travelling throughout NL and not only assisting but also upgrading the skills of vendors and partners, as they embrace the new tools.

## **Addendum-Product List Expansion**

### **Product Stewardship Plan 2019-2023, EPRA NL**

On December 10, 2020 the Board of Directors of the MMSB and the Minister of Environment, Climate Change and Municipalities added to the list of products included under the electronic product definition of the electronic waste regulation in Newfoundland and Labrador (Part V, Section 31.18 (f) (ix), Waste Management Regulations).

This addendum to the Product Stewardship Plan which was approved on March 7, 2019 is being provided to describe the actions to be taken by EPRA-NL to fulfill this new requirement.

#### **1. Product List Expansion**

EPRA NL will undertake the actions necessary to expand the list of products that will be collected at our drop-off locations and special collection events in Newfoundland and Labrador. Effective August 1, 2021 EPRA will include the following products in our collection efforts:

- External storage drives and modems
- Electronic readers
- Video game devices (consoles, handheld devices and controllers)
- Navigation systems
- Counter-top microwave ovens

An up-to-date listing of products covered by the Product Stewardship Plan will be listed on our website at: [www.recycleMYelectronics.ca/nl](http://www.recycleMYelectronics.ca/nl).

#### **2. Communication and Public Awareness**

##### **2.1. Communication Goals**

EPRA NL will undertake a communication strategy that ensures that the general public and other stakeholders are aware of the additions to the product list.

The communications plan will aim to provide clear messaging to all program stakeholders and meet the following goals:

- Increase awareness and call to action among the public
- Ensure that consumers and businesses are aware of the EPRA Program, in particular the additional products that will be accepted in the Program, where to take them for safe and secure recycling and prompting active participation in electronics recycling
- Make sure that the electronic products brand owners and retailers of regulated products are aware of their obligations related to the EPRA Program in NL
- Ensure EPRA Drop-off Centres are well informed regarding electronic products included in the Program and can provide accurate information to consumers

## **2.2. Communication Components**

### **2.2.1. Launch plan**

EPRA NL will undertake a formal launch of the expanded product list to ensure that awareness of the changes are highlighted with the general public. Because of ongoing uncertainty about safe practices during the ongoing coronavirus public health crisis we have mapped two options for a launch of this plan.

#### **Option 1: In-person Launch**

EPRA NL will hold an in-person press event to highlight the obligated products expansion in Newfoundland and Labrador. This will include the following components:

- Announcement/Press Release, leading up to the August 1, 2021 effective date
- Media Outreach, with the intent of securing media coverage and press interviews
- Press Event, which will include participation by EPRA management personnel and invitations to participate extended to the Minister of Environment, Climate Change and Municipalities; the CEO of the MMSB; and the Chairperson of the MMSB. This event will be hosted at a physical location to be determined (e.g. a Drop-off Location) and will feature use of EPRA's mobile classroom, which incorporates an educational component as well as a back-drop for the event
- Digital/social media support package for persons and groups who may not be able to physically join the launch event.

#### **Option 2: Virtual Launch**

If public health protocols prevent EPRA from hosting an in-person event then we will arrange a virtual event (i.e. a webinar). This approach will include an announcement/press release, media outreach, a social media support package and a webinar, hosted by EPRA and incorporating participation by the Minister of Environment, Climate Change and Municipalities; the CEO of the MMSB; and the Chairperson of the MMSB.

### **2.2.2. Public-facing collateral**

EPRA will refresh all public-facing collateral to coincide with the launch of the expanded products list. This will include new signage at drop off locations, new consumer brochures, new point-of-sale brochures, new tent cards at the retail level and a refreshed website to allow for an online search of accepted products.

### **2.2.3. Advertising Campaign**

EPRA will launch a fall advertising campaign, incorporating a variety of media strategies, including radio, television, print, digital and platform advertising.

## **Radio**

The Fall 2021 advertising campaign will use a thirty-second radio script that incorporates an overall electronics recycling message with the theme “What's inside counts”. This ad will be used on the VOXM and OZ-FM radio networks province-wide.

## **Television**

The Fall 2021 advertising campaign will feature a fifteen second television advertisement and will be featured on NTV and CBC province-wide.

## **Print**

Although print media is becoming a less-and-less impactful tool for informing and educating the public, when compared to digital advertising, we will make use of the Saltwire newspaper chain during the fall campaign, especially the newspapers targeting populations in rural Newfoundland and Labrador.

## **Digital**

The Fall 2021 advertising campaign will feature digital ads, using the “What's Inside Counts” campaign imagery along with looping copy that highlights a call-to-action with regard to electronics recycling. These digital ads will appear on online platforms including Bell, The Weather Network, CBC, EyeReturn and Instagram.

### **3. Outreach to Drop off locations**

We will ensure that our collections partners are knowledgeable about the additions to the obligated products list and are ready to accept the additional products effective August 1, 2021. We will ensure that this knowledge is imparted and changes to process are implemented by undertaking the following prior to August 1, 2021:

- A formal written communication to all drop off location operators outlining the changes
- An on-site information session with all operators and their front-line staff, prior to August 1<sup>st</sup>; or virtual information sessions if public health guidelines do not permit in-person presentations
- New signage at all drop-off locations
- New information brochures which can be presented to consumers when they drop electronics to the collection locations

### **4. Steward Engagement**

Brand Owners and Retailers of electronic products will be engaged ninety days prior to the effective date for implementation of the expanded product list with a view to informing existing stewards of the changes and inviting new brand owners and retailers to join our stewardship program in order to comply with the regulation. In preparation for the changes to the obligated product list, some outreach has already been completed with the Retail Council of Canada (RCC) and the Association of Home

Appliance Manufacturers (AHAM), as well as preparatory discussions with Electronics Product Stewardship Canada (EPSC) and the Product Clarification Team at EPRA Steward Services.

## **5. Steward List**

The list of brand owners participating in our stewardship program will change somewhat as this new list of obligated products is implemented. The list of stewards which are active in our program as of the date of this submission are available on our website at [www.recycleMYelectronics.ca/nl](http://www.recycleMYelectronics.ca/nl). This list will be updated as of August 1, 2021 implementation date and a revised list will be available at that time.

**Steward List – EPRA Newfoundland and Labrador**

<b>Company Name</b>	<b>Operating as</b>
10net Managed Solutions Ltd.	
11374486 CANADA INC.	EPROM COMPUTER SYSTEMS
1639878 ALBERTA LTD.	DBCS Computer
1order Inc	
2001 Audio Video	
2342239 Ontario Inc	Vuugo.com
2428391 Ontario Inc	Sunrise Records
341234 BC Ltd.	Microserve
3813151 CANADA INC.	
3D datacomm Inc.	
3M Canada Company	3M Canada Company
604402 N.B. Ltd	UR-Channel BTV
605494 Alberta Ltd.	Ink Quest
67949 NL & Lab LTD	Next Generation Electronics
6991165 CANADA INC.	DISTRIBUTION HMB
7584849 Canada Inc	On-line commerce
864884 ONTARIO INC.	AXXESS - INTERAD - GEOLUX
9013-6573 Québec Inc.	SIR Solutions
9097-1086 Quebec Inc	CES Distribution
9266-1677 QUEBEC INC.	HRS GLOBAL
A-Power Computer Ltd.	
Aaron's Canada ULC	Aaron's Canada ULC
AB Sciex	
ABCD Tech Services Inc.	
ABM Systems Limited	
Accelerated Connections Inc.	
Acer America Corporation	
Ademco III Ltd.	ADI
ADFLOW Networks Inc.	
Advanced Chippewa Technologies Inc	ACT inc
Agilent Technologies Canada Inc.	
Ahearn & Soper Inc	
Altronics Ltd	Altronics Ltd
AM/PM Systems Ltd	
Amazon.com.ca, Inc.	
Ameta International Co. Ltd	

Anixter Canada Inc	
Apple Canada Inc.	
Aptika	
ASI Computer Technologies (Canada) Corp.	
ASUS Computer International	
Audcomp Group Inc	Audcomp
Audio-Technica Canada Inc	
Auto-Star Compusystems Inc.	
AVAD Canada	
Avaya Canada Corp	
AVI-SPL Canada Ltd.	
	Aylwards Home Centre - Home Hardware- The Source
Aylwards (1986) Ltd.	
Backman Vid-Comm Ltd.	Backman Vidcom
Baine Johnston Furniture Limited	Leon's
Bay Bloor Radio Inc	Bay Bloor Radio
BDI, a division of Bell Mobility Inc.	
Beckman Coulter Canada, L.P.	
Bed Bath & Beyond Canada L.P.	Bed Bath & Beyond
Bell Canada	
Bell Canada - Bell Business Markets	
Bell ExpressVu Limited Partnership	
Bell Mobility Inc	Bell Mobility Inc
Best Buy Canada Ltd.	Best Buy, Future Shop
Bestrade Inc.	
Better1 Inc.	Better1.com
Bitswift Technology Solutions Inc.	Bitswift Tech
BlueBird IT Solutions Inc	BlueBird IT Solutions Inc
Bond Brand Loyalty Inc.	
Bose Limited	
Bragg Communication	Eastlink
Broadway Camera Ltd.	
Brother International Corporation (Canada) Ltd.	
Bulletproof Solutions ULC	
BURMAN & FELLOWS GROUP INC.	BFG
C.B. Electronics Limited	Custom Computer Centre
C.P.U. DESIGN INC.	
CA MTT Innovation Incorporated	Barco NV
Cabela's Retail Canada Inc.	Cabela's Retail Canada Inc.
CAMACC Systems Inc	
Canada Computers Inc.	Canada Computers

Canadian Tire Corporation, Limited	
Canadian Tire Petroleum	
Canon Canada Inc	
CAPSTONE IMAGING SUPPLIES INC	
Caravan Enterprises Ltd	The Source
Carlyle Printers, Service & Supplies Ltd.	
Carnival Corporation	
Cascadia Motivation Inc.	
CashierPRO Retail Systems Inc.	
CashTech Currency Products Inc.	
Casio Canada Ltd	
Casseroles Cora Inc.	
CBCI TELECOM CANADA INC	CBCI TELECOM CANADA INC
CDK Global (Canada) Limited	
CDW Canada Inc.	
CENDIRECT.COM INC.	CENDIRECT.COM
Central Distributors Ltd.	Central Distributors Ltd.
CENTRAL MICROSYSTEMS 4000 INC.	CENTRAL MICROSYSTEMS
Chateau Manis Electronics Inc	Chateau
Christie Digital Systems Canada Inc.	
Circus World Displays Limited	
Cisco Systems Canada Co	Cisco Systems
CLEAN ERGO SOLUTIONS INC	
Code Sphere Network Inc.	
Cohen's Home Furnishings (2010) Limited	Cohen's Home Furnishings
Colemans Shoppers World Limited	Colemans Brandsource Home Furnishings
Colin Vardy	Repair IT Services
Compro Services Limited	Computer Sales and Service
CompuCom Canada Co.	
Compugen Inc	Compugen Inc
Compusult Limited	
Computer Shack Inc.	Computer Shack Inc.
Comtronic Computer Inc.	Comtronic Computer Inc.
Coreio Inc	
CORPORATE EXPRESS	STAPLES ADVANTAGE
COSTCO WHOLESALE CANADA LTD	

CPU SERVICE D'ORDINATEUR INC.	
Crestron Electronics	
Crutchfield Corporation	same
CT Corporate Services Inc	CT Corporate Services Inc
CTG Brands Inc,	
D&H Canada ULC	D&H Canada ULC
D-Link Networks	
Data Integrity Inc.	Data Integrity Inc.
Dell Canada Inc.	
Dial-A-Tech Computer Services Limited	
Dicks and Company, Ltd.	Dicks and Company Basics
Digital River globalTech, Inc	
Diversions Entertainment Inc.	Diversions Computer Centre
Diversiteh Services Inc.	DSI
Dollarama LP	
Dramis Communications Solutions Ltd	
Drummond Informatique Ltée	MICROAGE
DSM Distribution	maplemicro.ca
Dvise Telecom Solutions Inc.	
Dymaxion Research Limited	
Dynabook Canada Inc.	
DYSYS Media Solutions Inc	DYSYS Media Solutions Inc
East Coast Technologies Inc	MicroAge Computer Centres
Edco Electronics Inc./Ested Industries Inc.	
Edge 2 Core Incorporated	EDGE 2 CORE
ELCO Systems Inc	
Electronic Boutique Canada Inc	eb games
Elo Touch Solutions, Inc.	
Enablecore Technologies Inc.	
Engage People Inc.	
Engenius Technologies Canada Inc	EnGenius
Entreprise Robert Thibert inc.	
Epson Canada Limited	
FGL Sports LTD.	
FGL Sports Ltd.	FGL Sports Franchise Bloc
Ford Motor Company of Canada, Limited	Ford of Canada
Frank Buckle Management Inc.	Cohens Home Furnishings
FrontierPC.com Computer Inc	FrontierPC.com
Fujifilm Canada Inc	

FUJITSU CANADA INC.	FUJITSU CANADA INC.
Fujitsu Frontech Canada Inc.	
Fully Managed Inc.	Fully Managed Inc.
Funai Corporation	
GB Micro Electronics Inc.	
GBS Communications Inc.	GBS Technologies
Geek Monkey Technologies Incorporated	Geek Monkey
Gem-Sen Distribution	Gem-Sen Distribution
General Electric Canada	GE Healthcare
Gentec International	
Gentek Marketing Inc.	
Giant Tiger Stores Limited	
Glaswegian Enterprises Inc.	Audio Video Unlimited
Global Shopex LLC	Globalshopex
Google Canada Corporation	
Google Inc	
Grand & Toy Limited/Grand & Toy Limited	Grand & Toy
Graybar Canada Limited	Graybar Canada Limited
Groupe BMR inc.	Groupe BMR inc.
Gunnebo Canada Inc.	
H&B Sellers Inc.	
Haier America Trading, LLC	
Hall Telecommunications Supply Ltd.	Hall Telecommunications Supply Ltd.
HealthHub Patient Engagement Solutions	HealthHub Patient Engagement Solutions
Helix Global Solutions	
Henry's Enterprises Inc.	
Her Majesty the Queen in Right of Canada as Represented by the Chief of Defense Staff in His Non Public Property Capacity	
Hewlett Packard Enterprise Canada Co.	CANEX
Hisense Canada Co., Ltd.	
Hiffar Concepts Ltd	
Home Depot of Canada Inc.	
Home Hardware Stores Limited	
HoMedics Group Canada	
HP Canada Co	HP Canada
Hudson's Bay Company (HBC) - Head Office	The Bay, Home Outfitters, Saks Fifth Avenue, Saks Off Fifth

Hypertec Systemes Inc.	
HYPERTECHNOLOGIE CIARA INC.	
IBM Canada Ltd.	
IKEA Canada Limited Partnership	
IKEA Supply AG	Importer
IMP Group Limited	IMP Solutions
Indigo Books & Music Inc.	Indigo
Ingram Micro Inc.	
Insight Canada Inc.	
Intellico IDS Inc	BlueStar Canada
IRONSTONE DISTRIBUTION LIMITED	LOGOWERKZ
Ivan's Camera (2017) Ltd.	Ivan's Audio-Visual
Jam Industries Ltd	
Jetview Electronics Ltd.	
Jim Crewe Ltd	Jim Crewe LTD
Jump Plus Store ULC	Jump+
JVCKENWOOD Canada Inc.	
K.A.B.N. ENTERPRISES INC.	D & K COMPUTERS
Kel-Tech Laser Inc.	Kel-Tech Laser Inc.
KMK Services Inc	
Kodak Canada ULC	Kodak Canada ULC
Konica Minolta Business Solutions (Canada) Ltd.	
La Clef de Sol Inc.	
LAMA INC	LAMATEL
Lee Valley Tools Ltd	
Lenbrook Industries Limited	Lenbrook Canada
Lenovo (Canada) Inc.	
Lenovo Global Technology (Canada) Inc.	
Lexmark Canada Inc.	
LG Electronics Canada, Inc.	
LIN HAW INTERNATIONAL CO., LTD.	
Loblaw Inc.	Loblaw Companies Limited
London Drugs Limited	
Long & McQuade Limited	
Long View Systems Corporation	Long View Systems
Longtech Computer Distribution Inc	computer parts wholesaler and retailer
Lorex Technology Inc.	Lorex Technology Inc.
Loyalty Solutions Canada Inc	Loyalty Solutions Canada Inc
LS Travel Retail North America Inc.	
M-S Cash Drawer Canada LP	

Makita Canada Inc.	Makita Canada Inc.
Mark's	Mark's
MDG Computers Inc	
Memory Express Inc.	
Michael Rossy Ltée	Michael Rossy Ltée
Micro-Tech Computer Centre, Inc	
Microcad Computer Corporation	
Microsoft Canada Inc	Microsoft Canada Inc
Microsoft Corporation	
Microsoft Retail Store - Canada Inc.	
Micwil Group of Companies Ltd.	
Mike's Technology Corp	Mike's Computer Shop
MINI-MICRO SUPPLY INC CANADA	
Miovision Technologies	
Miskwaa Technologies Inc	Miskwaa Tech
Mitek Canada Distribution, A Partnership	
Mitsubishi Electric Sales Canada Inc.	
MONITEURS ANGELCARE INC	MONITEURS ANGELCARE INC
Motorola Mobility LLC	
Motorola Solutions Canada Inc.	
Mountain Equipment Co-op	
Mundy Sales Incentives Inc.	Mundy Sales
NCR Canada Corp.	
NEC Canada Inc.	NEC Canada Inc.
NEC Display Solutions of America, Inc	
Netlink Computer Inc.	NCIX
New Line Incentives Inc.	
Newegg Canada Inc.	
NEXT SUCCESS INC	
NicTech Electronics Ltd	The Source
Nikon Canada Inc.	
Nisha Technologies Inc.	Nisha Technologies Inc.
NorthamTek Technology Inc.	
Northern Micro Inc	
Notre Dame Agencies	Notre Dame Home Furnishings
Nova Networks Inc	
Novexco Inc.	BuroPLUS
NWD Systems (Montreal) Inc.	MicroAge
Oak Incentives Group Inc.	
OCEANVIEW HARDWARE LTD	LEWISPORTE HOME HARDWARE

Okidata Americas Inc.	
OnX Enterprise Solutions LTD	
Optoma Technology (Canada), Inc.	
Oracle Canada ULC	
Panasonic Canada Inc.	
Paradigm Electronics Inc.	
Paragon Micro IT Solutions Group Canada ULC	Paragon Micro Canada
PartSource Inc.	
Pathix ASP, a division of Vector Aerospace	Pathix ASP
PATTERSON DENTAL CANADA, INC.	PATTERSON DENTAIRE CANADA, INC.
Paystation Inc.	
PBS Financial Systems Inc.	
PCM SALES CANADA, INC.	
Peninsula Wholesale Ltd.	Burfitt's Electro-Tech
PFU Canada Inc.	PFU Canada Inc.
PHASELOCK SYSTEMS INTERNATIONAL INC.	
Pineapple Bytes Inc.	
Pinnacle Networks Inc	
Pioneer Electronics (USA) Inc.	
Pippin Technical Service Ltd	
Pitney Bowes Inc.	
Plantronics Canada Inc.	Poly
Powerland Computers Ltd.	
Powernode Computer Inc	
POWERONE TECHNOLOGIES INC.	
Prima Information Solutions Inc.	Prima
Princess Auto Ltd	
Printers Plus	Printers Plus
Product Solutions Group	
Progressive Sales Canada Electronics Inc	
Quad Source Canada Inc.	
Quartet Service Inc.	
Quebecom Info Plus inc.	
RAE Industrial Electronics Ltd	
Rakuten Kobo Inc	
Randmar Inc	
Randy Tavenor	Office Tech
RED APPLE STORES INC.	Red Apple

Reprographics Ltd.	
Ricoh Canada Inc.	Ricoh Canada Inc.
Rinax Systems Ltd	Rinax Computer Systems
RLOGISTICS LIMITED PATNERSHIP	Factory Direct
Robert Bosch Inc.	
Rogers Communicatons Inc	
Roland Canada Ltd.	
RONA inc.	RONA
Rose & MacDonald Sales Agents Inc.	
RS Distribution Inc.	
RU-LINK COMPUTER CORP.	1C2C.COM, CANBUYIT.CA, RU-LINK COMPUTER CORP.
Rugged Technologies Inc.	Rugged Technologies Inc.
	Buying and selling
Run Communication Inc.	telecommunications equipment
Runat Enterprises Ltd	Hometown Electronics
S. P. Richards Co. Canada Inc.	Wholesaler
Samsung Electronics Canada Inc.	
scil animal care company	Vet Novations Canada Inc.
Sears Canada Inc. - Head Office	
Sennheiser Canada (Inc.)	Sennheiser Canada (Inc.)
SF Marketing Inc	SF Marketing Inc
Sharp Electronics of Canada Ltd.	
Shaw Satellite GP	
SHI Canada ULC	
Shoppers Drug Mart Inc.	Shoppers Drug Mart
Simply Computing Inc.	Simply Computing
SiriusXM Canada Inc	
SOFTCHOICE LP	
Solutions 2 GO Inc.	
Solutions de Reconnaissance	Solutions de Reconnaissance
Rideau Inc.	Rideau Inc.
Somcan Distribution Ltd.	
Sonos, Inc.	
Sony Electronics Inc	
Sony Interactive Entertainment Canada	
Soroc Technology Inc.	Soroc Technology Inc.
Sound United Canada Inc.	
SpeedLine Solutions Inc.	
Spicers Canada ULC	Spicers
Stampede Presentation Products	
STAPLES THE BUSINESS DEPOT	Staples Canada

Staub Electronics Ltd	Staub Electronics
SYNNEX Canada Limited	
TAKNOLOGY (CANADA) INC.	
TEAMTEK WHOLESALÉ DBA VISION BUSINESS PRODUCTS	TEAMTEK WHOLESALÉ
Tech Data Canada Corporation	Tech Data Canada Corporation
Telecom Computer Inc	
TELUS Communications Inc.	
Telus Health & Payment Solutions Limited Partnership	
TELUS Health Solutions Inc.	
Tenva TS Canada ULC	Tenva TS Canada ULC
The Brick Warehouse Corporation	
The North West Company	
The Priestman Electronics Corporation	Precor Electronis
The Source (Bell) Electronics Inc.	The Source
The Watershed Group	
THEKEYKEY STORE CORP.	THEKEYKEY STORE CORP. DirectDial.com, PC-Canada.com, Softwarecity.ca
THINQ Technologies Ltd.	
Tomauri Inc.	
Toshiba Global Commerce Solutions (Canada) Ltd.	
Toshiba Tec Canada Business Solutions Inc.	
Toys R Us (Canada) Ltd.	
Travana Networks Ltd.	Travana Networks
Trends Electronics International Inc.	
Trenton Distributors Limited	
Triware Technologies Inc.	Triware Technologies Inc.
TRUTONE ELECTRONICS INC	TRUTONE ELECTRONICS INC
TTE Technology	TCL North America
TTX CANADA INC	
Tyco Safety Products Canada	
Tyco Safety Products Canada Ltd.	
UTC Fire & Security Canada	Chubb Edwards
Vantechs Computers	
Venturer Electronics, Inc.	
Veritiv Canada Inc	
VERTICAL PÉRIPHÉRIQUES INC	VERTICAL PÉRIPHÉRIQUES INC
Village Music Centre Inc.	Village Music

Vision33	
Visions Electronics Limited Partnership	
Vtech Technologies Canada Ltd.	
Wal-Mart Canada Corp.	
Warr's Pharmacy Ltd	The Source Express
WBM Technologies Inc	
Western Marine Holding Ltd	
Wilson's Security Limited	Wilson's Security
Winners Merchants International LP	Winners / HomeSense / Marshalls
Wisdom Electronics Inc.	
Withings, Inc.	
World Wide Technology Canada ULC	
Wren Sound Systems, LLC	
Wurth Canada Limited	
Xerox Canada Limited	
XpressIT Solutions Inc.	XpressIT
Yamaha Canada Music	
Your Computer Connection Inc.	
Zebra Technologies International LLC (ZTI) CORPORATE & INTERNATIONAL HEADQUARTERS	
Ziestech Distributors Inc	
Zones Canada Inc.	
Zycom Technology Inc	