



**AUTHORIZED DROP-OFF POINT
APPROVAL PROGRAM (ADOPAP)**

V2019.08_A



The *Authorized Drop-Off Point Approval Program* (ADOPAP) developed by the Quebec Electronic Products Recycling Association (EPRA-Québec) defines the approval and inspection processes as well as the minimum operational, environmental, safety, health and data protection requirements for organizations wanting to operate an authorized drop-off point.

The ADOPAP ensures that products covered by the Program are handled responsibly in order to adequately preserve the environment as well as workers' health and safety, and sets a framework for protecting data and products containing data from unauthorized access or use.

The ADOPAP does not supersede any regulatory requirements or exempt collection site operators from their responsibility to comply with regulatory obligations. In the event that a provision of the ADOPAP conflicts with a regulatory requirement, the latter will prevail.

The ADOPAP may be revised or updated at EPRA-Québec's discretion in order to ensure that the products covered by the Program are properly handled and to prevent unauthorized access, theft, improper discharge in the environment as well as risks to health and safety.

The ADOPAP includes the following:

PART A – TERMS AND DEFINITIONS:

Glossary of the main terms used.

PART B – AUTHORIZED DROP-OFF POINT STANDARD (ADOP Standard):

Defines the requirements authorized drop-off points (ADOP) must comply with in order to be recognized by EPRA-Québec.

IMPLEMENTATION GUIDE:

Provides ADOPs with complementary information and instructions regarding the application of the ADOP Standard, as well as examples of satisfactory proof of compliance with the ADOP Standard.

PART C QUALIFICATION PROCESS:

Defines the steps to follow in order to be recognized as an ADOP.

PART D INSPECTION PROCESS:

Defines the ADOP inspection process, including follow-up of non-conformances.

APPENDIX A – AUTHORIZED DROP-OFF POINT – INFORMATION SHEET

APPENDIX B – INSPECTION REPORT – SAMPLE

PART A TERMS AND DEFINITIONS

EPRA	Electronic Products Recycling Association (national entity).
EPRA-Québec	Electronic Products Recycling Association of Québec (provincial entity).
Discharge	Accidental discharge into the environment.
Implementation Guide	Document intended for authorized drop-off points that sets out directives and additional details concerning the application of the Standard.
Authorized Drop-Off Point Standard	Standard that defines the minimum operational, environmental, safety, health and data protection requirements for organizations wanting to operate an authorized drop-off point in accordance with the <i>Québec Program for the Recovery and Reclamation of Electronic Products</i> .
Authorized drop-off point	Location where citizens and/or industrial, commercial and institutional (ICI) businesses may drop off electronic products covered by the Program.
First responder	Police officer, firefighter or ambulance personnel.
Electronic product	Electronic device or equipment that, by virtue of the Regulation respecting the recovery and reclamation of products by enterprises, is covered by the program implemented and managed by EPRA-Québec, including end-of-life electronics (see the complete list of covered electronics at https://www.recyclemyelectronics.ca/qc/what-can-i-recycle/).
Program	The <i>Québec Program for the Recovery and Reclamation of Electronic Products</i> mandated by the Regulation respecting the recovery and reclamation of products by enterprises that is implemented and managed by EPRA-Québec.
Authorized Drop-Off Point Approval Program	Document that defines the minimum requirements as well as approval and inspection processes applicable to authorized drop-off points.
Refurbishing	Any dismantling of electronic products for the purpose of conducting internal tests or troubleshooting, replacing or repairing defective parts, except such consumable components as batteries, cartridges, fuser units, etc.
Reuse	Transfer of usable electronic products from one user to another so that the product may continue to be used for its original purpose without repair or change.
Regulation	Regulation respecting the recovery and reclamation of products by enterprises, CQLR, c. Q-2, r. 40.1, and all its amendments.
Collection site	Location where EPRA-Québec or its designated representative collects electronic products.
Worker	Full-time, part-time or contract employee.
User	Member of the public or company employee who uses the services of an authorized drop-off point to leave their end-of-life electronics for the purpose of recycling or reuse.

PART B

AUTHORIZED DROP-OFF POINT STANDARD (ADOP STANDARD)

1.0 GENERAL REQUIREMENTS

All authorized drop-off points (ADOP) must:

- 1.1. Be open to the public and accept covered electronic products (EP) at no charge.
- 1.2. Have valid permits and authorizations required to operate an ADOP within a given jurisdiction.
- 1.3. Be covered by commercial or comprehensive general liability insurance that includes protection against bodily injury and property damage as well as a rider for comprehensive business and contractual liability, with combined coverage of at least \$1 million per event and \$1 million civil liability.
- 1.4. Enforce a policy that deters employees from stealing collected electronics and specifies applicable penalties ranging from minimum measures to immediate firing in cases of theft or data security breach.

Implementation:

- 1.1. *Be open to the public and not apply restrictions on the user, such as collection fees for handling electronic products covered by the Program.*
- 1.2. *Hold a business or operating permit and/or waste handling registration or authorization.*
- 1.3. *Maintain a \$1 million civil responsibility insurance for pollution as well as commercial or comprehensive general liability insurance coverage.*
- 1.4. *Enforce a theft deterrence policy that:*
 - *Defines expectations regarding safe EP handling (receiving, sorting, warehousing and packaging) to prevent theft or access to data.*
 - *Spells out applicable consequences of policy violations.*
 - *Is properly communicated and understood by all employees.*

2.0 REQUIREMENTS AUTHORIZED DROP-OFF POINTS (ADOPs) MUST MEET

All ADOPs must be adequately maintained to ensure safe user access and EP warehousing. They must also:

- 2.1. Provide the public with product receiving areas that are easily accessible, free of danger, uncluttered with mobile equipment and appropriately equipped to facilitate EP drop-off.
- 2.2. Ensure that sorting and/or warehousing areas are sheltered and access-controlled.
- 2.3. Have in place appropriate security and control measures that prevent unauthorized access to the site, warehousing areas and EPs, even outside operating hours.

Implementation:

- Installations and operational controls must be adequately maintained.*
- 2.1. *Product receiving areas must be easily accessible to the public, free of danger, uncluttered with mobile equipment, and appropriately equipped to facilitate EP drop-off.*
 - 2.2. *Sorting and warehousing areas must be enclosed so as to avoid exposure to bad weather and unauthorized access.*
 - 2.3. *Appropriate security measures must be in place to prevent unauthorized access to the site, theft as well as removal of collected products or the data they may contain.*

3.0 MEASURES TO PROTECT THE ENVIRONMENT, HEALTH AND SAFETY

All ADOPs must have in place measures to protect the environment as well as health and safety in order to prevent accidents, injury and discharges into the environment. As a minimum, ADOPs must:

- 3.1. Ensure that EPs, particularly damaged products, are appropriately handled (receiving, sorting, warehousing and packaging).
- 3.2. Maintain documented procedures describing how EPRA-Québec must be notified in the event of regulatory decisions, penalties, data security breaches, product theft and other incidents, including those requiring the assistance of first responders (accidents or discharges).

4.0 TRAINING

At least once a year, all ADOPs must provide personnel with documented training on the following topics:

- 4.1. Identification of EPs covered by the Program.
- 4.2. Appropriate EP handling procedures (receiving, sorting, warehousing and packaging).
- 4.3. Measures to apply in order to ensure the integrity of collected EPs, including data security.
- 4.4. EP monitoring requirements, from receiving to shipping.
- 4.5. Safeguards to prevent covered EPs from being handed over to any party other than EPRA-Québec.

Implementation:

- 3.1. *Work directives or operational procedures or training regarding requirements applicable to EP receiving, sorting, warehousing and packaging must be provided to ADOP personnel.*
- 3.2. *Procedures that define the responsibilities of all parties involved and that specify relevant information and contact details to respond and report emergency situations and other incidents within 24 hours of the event. Personnel must be fully aware of these procedures.*

Implementation:

Implement a training and evaluation program that defines qualification and training requirements and the frequency of subsequent refresher courses.

Maintain an appropriate log of completed training and personnel evaluations. Personnel must:

- 4.1. *Be able to identify EPs covered by the Program.*
- 4.2. *Know how to handle EPs (sorting, warehousing, packaging).*
- 4.3. *Know the applicable measures to ensure data security (keep all collected EPs whole and intact).*
- 4.4. *Ensure that EPs are adequately processed, and processed separately from other types of products (e.g. metals, electrical products, other non-covered electronics).*
- 4.5. *Know the applicable measures to ensure that all covered EPs are handed over to EPRA-Québec (e.g. provide users with information).*

PART C

QUALIFICATION PROCESS

5.0 ELIGIBILITY

To be considered as an authorized drop-off point (ADOP), the organization must:

- 5.1. Not reuse, refurbish or manage, in any way whatsoever, any covered product outside EPRA-Québec's program.
- 5.2. Comply with the Authorized Drop-Off Point Standard (ADOP Standard) minimum requirements and any other applicable regulatory requirement, and maintain documented evidence of such compliance.

6.0 QUALIFICATION PROCESS

The ADOP qualification process unfolds over three steps:

- 6.1. An organization wishing to obtain ADOP status must provide certain information to EPRA-Québec (see Appendix A: Authorized Drop-Off Point – Information Sheet).
- 6.2. EPRA-Québec will determine whether the organization qualifies for ADOP status.
- 6.3. Once all requirements have been met, EPRA-Québec may, at its discretion, establish a service agreement with the organization to which it has granted ADOP status.

PART D INSPECTION PROCESS

7.0 INSPECTION OBJECTIVES

- 7.1. The purpose of the inspection is to verify whether the authorized drop-off point (ADOP) and its operations meet the requirements of the Authorized Drop-Off Point Standard (ADOP Standard).
- 7.2. The inspection consists in an examination and verification of material evidence that may include, but is not limited to, policies, procedures, work directives, shipping logs, training files, permits, certificates, personnel interviews, and general observations.

8.0 INSPECTIONS

- 8.1. EPRA-Québec may, at its discretion, carry out inspections in order to confirm that a recognized ADOP continues to operate in compliance with the ADOP Standard. Inspections may include, but are not limited to, an examination of the site, documents and/or logs.
- 8.2. Non-compliance with the requirements of EPRA-Québec's program or the ADOP Standard will result in the revocation of "authorized drop-off point" status.

9.0 COMMUNICATION OF RESULTS

- 9.1. The inspector will document all results, opportunities for improvement and non-conformances revealed by the inspection via a final written ADOP inspection report submitted to EPRA-Québec, with a copy to the ADOP (see Appendix B: Inspection Report – Sample).

10.0 CLASSIFICATION OF INSPECTION RESULTS

Report items noted during the inspection will be classified as follows:

- 10.1. **Opportunity for improvement** – The report item does not present a risk for the environment, worker safety or data security, and does not violate a provision of the ADOP Standard currently in effect, but could constitute an opportunity for improvement.
- 10.2. **Non-conformance** – Operations that do not comply with one or more of the provisions of the ADOP Standard currently in effect, with a regulatory requirement, or with procedures and programs established by the organization.

11.0 CORRECTIVE MEASURES PLAN

- 11.1. While opportunities for improvement do not require the application of an official follow-up procedure, they will be reviewed in the course of a subsequent inspection.
- 11.2. An action plan to remedy non-conformance issues must be submitted to the inspector within 15 days of receiving the final report.
 - 11.2.1. All non-conformance issues must be satisfactorily resolved within a reasonable period of time (appropriate with regard to the non-conformance issue) in order to avoid their recurrence.
 - 11.2.2. In the event that an ADOP is unable to satisfactorily resolve a non-conformance within a reasonable period of time, "authorized drop-off point" status will be revoked.

APPENDIX A

AUTHORIZED DROP-OFF POINT – INFORMATION SHEET

GENERAL INFORMATION

- 1 Applicant's full name
(municipality/company): _____
- 2 Full address: _____
- 3 Name of signing authority: _____
- 4 Title of signing authority: _____
- 5 Email of signing authority: _____

- 6 Name, contact details and
business hours/period covered
by the agreement:
Internal use: Appendix B section E

Name/address/telephone of each drop-off point	Business hours/period of each drop-off point

- 7 Target clientele:
Internal use: Appendix B section D Residents AND/OR ICI (industrial, commercial, and
institutional businesses)
- 8 Electronics to be palletized by the
applicant's personnel before being
handed over to EPRA-Québec:
Internal use: Appendix B section C Yes OR No
- 9a) Storage capacity:
Internal use: Appendix B section F&G Number of pallets _____ OR 24 pallets* OR 48 pallets*
- 9b) *If storing 24 pallets or more,
loading of electronics is
carried out by:
Internal use: Appendix B section H Applicant OR EPRA-Québec
- 10 Storage space type:
Internal use: Appendix B section B Municipal garage OR Fabric shelter (megadome)
- Ocean container owned by the site
- Other: _____

COORDINATING PICKUPS – CONTACT PERSON

- 11 Name: _____
- 12 Title or function: _____
- 13 Telephone: _____
- 14 Email: _____

BILLING – CONTACT PERSON

- 15 Name: _____
- 16 Title or function: _____
- 17 Telephone: _____
- 18 Email: _____
- 19 GST number: _____
- 20 QST number: _____
- 21 Direct deposit: YES OR NO

Rapport d'inspection

Numéro : 1794-1

Site : Écocentre de la municipalité
123, rue du bonheur
Montréal G0V1C0

Personne(s) rencontrée(s) :

Nom Préposée

Nom Préposé

Date d'inspection : 2017-06-06

Inspecteur : Nom de l'inspecteur

Conclusion de l'audit : 2-Maintien conditionnel du statut << Point de dépôt officiel >>

Opportunité d'amélioration

Numéro : 1980

Numéro de l'exigence du PAPDO : 1.4

Numéro du rapport d'inspection : 1794-1

Description de l'exigence :

Maintenir une politique dissuasive en matière de vol commis par les employés, précisant les mesures allant du recours minimal jusqu'au congédiement immédiat en cas de vol ou d'atteinte à la sécurité des données

Situation observée :

Il n'y a pas de démonstration que la politique contre le vol ou le retrait de produits ou items sur le site est communiquée au personnel.

Non-conformité

Numéro : **1981**

Numéro de l'exigence du PAPDO : 4.1

Numéro du rapport d'inspection : 1794-1

Description de l'exigence :

Au moins une fois l'an, tous les PDO doivent offrir une formation documentée pour le personnel sur le sujet suivant : identification des produits électroniques visés par le programme.

Situation observée :

Le personnel rencontré lors de l'inspection n'est pas capable d'identifier les produits électroniques visés. En ce moment, tous les produits électroniques (visés et non visés) ainsi que les produits électriques (ex.: micro-ondes, grille-pain, etc.) sont déposés dans les conteneurs destinés au recyclage des produits électroniques visés par le programme de l'ARPE.

Sections à remplir par le point de dépôt (PDO)

Mesure(s) corrective(s) : (Le PDO doit décrire les actions à prendre afin de corriger la situation actuelle) Échéance : 2017-08-21
(aaaa-mm-jj)

Retirer les produits non visés qui se trouvent dans les contenants destinés à l'ARPE-Québec.
Donner, dans les plus brefs délais, la formation nécessaire au personnel de l'écocentre afin de transmettre les connaissances requises au personnel.

Plan d'action : (Le PDO doit décrire les actions à prendre afin de prévenir que ce problème se reproduise) Échéance : 2017-08-21
(aaaa-mm-jj)

Une formation sera ajoutée au plan de formation annuel (ainsi que lors de l'embauche) au sujet des exigences liées à l'entente « Point de dépôt officiel pour le recyclage des produits électroniques ».

Section réservée à l'ARPE-Québec

Suivi :

Complété :

Date de suivi : 2017-08-21
(aaaa-mm-jj)

Mesure corrective implantée
Plan d'action à vérifier à l'échéance

Remarque(s) :

-Le site est situé en forêt.

-Un conteneur maritime avec un verouillage approprié (cadenas et verrou) est utilisé pour l'entreposage des produits électroniques.