End-of-Life Electronics Stewardship Program for Saskatchewan

Submitted to: **Saskatchewan Ministry of Environment**

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

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End-of-Life Electronics Stewardship Program for Saskatchewan

1 Introduction

Electronic Products Recycling Association (EPRA) is pleased to submit our End-of-Life Electronics (EOLE) Stewardship Program for Saskatchewan.

EPRA, a non-for-profit association, incorporated to manage recycling programs across Canada, is chartered with providing regulatory compliance with our 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.

The Product Stewardship Program's aim is to divert designated EOLE from landfill or illegal export and provide efficient and effective recycling.

The *Electronic Equipment Stewardship Regulations (E-10.22 Reg 6)* (Regulation) of the *Environmental Protection Management Act 2010*, sets the requirements for stewards of designated materials to have a program of their own or join an approved industry-funded program. EPRA provides an industry-led program that allows ALL designated stewards to participate and fulfill their compliance to the Regulation. In Saskatchewan over 700 stewards of designated electronics under this regulation have chosen EPRA to manage the recycling program on their behalf to ensure not only compliance but also delivery of effective and efficient electronics recycling.

2 Program Summary

This document builds on the previous approved EPRA program plan, knows as the Product Management Plan, designed to divert regulated EOLE products from disposal, as required by the Regulation.

An EOLE recycling program has operated successfully in Saskatchewan since February of 2007 and during that time frame there have been two amendments to expand the range of products covered under the regulation. As of January 2018, over 29,000 metric tonnes of waste electronics have been collected in Saskatchewan.

Under our plan, regulated electronic products are not only diverted from landfill but also from illegal export through the collection and recycling of these products at their end-of-life. The recycled materials are then re-introduced into the manufacturing supply chain. The program's resulting benefits are profiled in the communications and public awareness strategy.

An up-to-date listing of products addressed by this plan can be found at https://www.recyclemyelectronics.ca/sk/. EPRA responsibly recycles all regulated electronics as well as the associated components that are provided with the original product such as cabling, ink & toner cartridges, and batteries. To further clarify on batteries, EPRA handles the collection and recycling of batteries that are contained in or packaged with obligated electronics at time of sale (also known as embedded batteries) and likewise are inside of electronics returned to the EPRA collection network at the end of product life.

The stewardship plan is based on a shared responsibility model where manufacturers, retailers, consumers, and government all have a role to play.

- Manufacturers, retailers, distributors, and other suppliers of regulated devices (stewards) are responsible for providing the collection and recycling program that will manage all EOLE items identified in the Regulation;

- Stewards are responsible for ensuring that an Environmental Handling Fee (EHF) is remitted to the EPRA Program to fund the collection and recycling of obligated product;
- Residents are responsible for disposing of their EOLE at designated drop-off locations;
- Program plan manager (EPRA) provides the drop-off locations that will receive EOLE without charge and with the assurance that these items will be recycled responsibly; and
- Government enforces the regulations to ensure full program compliance.

The EHF is remitted to EPRA to cover the costs of operating the electronics recycling program. The EHF is not collected by the Provincial Government, nor is it considered to be a tax or use of public funds. EPRA has a compliance program in place and audits stewards for adherence to the steward agreement and program requirements.

Materials are collected, consolidated, and recycled under contractual agreements with service providers that meet the EPRA standards for those activities.

EPRA will engage with businesses, municipalities, and other organizations to collect EOLE.

EPRA seeks to maximize recycling activities within the province, within the framework of delivering cost effective and environmentally responsible solutions.

EPRA has a communication strategy and public education element, including public transparency, for financial and environmental reporting.

Performance indicators are harmonized with other electronic stewardship programs in Canada based on a core set of performance indicators.

3 Program Objectives

EPRA offers an EOLE product stewardship management program that is consistent with industry's guiding principles for stewardship programs which include:

- Open to all obligated manufacturers, retailers, and others obligated by the regulation;
- A level playing field that ensures fair competition;
- A high level of compliance and eliminates the potential for free-riders;
- A method to address the issue of orphan or historic products;
- Safe recycling is delivered by all processors meeting and being audited to the Electronics Recycling Standard (ERS);
- The program is delivered in an environmentally sound and economically efficient manner;
- Public transparency for financial and environmental reporting.
- Harmonization with other jurisdictions, where and to the extent possible;

4 Observance of Federal, Provincial and Territorial Laws and Policies

EPRA is incorporated under the Canada Not-for-Profit Corporations Act and is governed by a Board of Directors. The Program's Federal Corporations information is available at the link:

https://www.ic.gc.ca/app/scr/cc/CorporationsCanada/fdrlCrpDtls.html?corpId=7838409

EPRA adheres to all existing Federal and Provincial laws and policies that apply to the management of solid waste and recycling, and any activity associated with, or arising from, recycling. No activity undertaken or required by EPRA through its relationship with other entities shall impair free trade internationally or inter-provincially for new electronics, used electronics in whole or in part, or other commodities arising from EPRA activities and programs in Saskatchewan.

5   Management Structure of EPRA

EPRA operates a program in Saskatchewan for a wide range of obligated electronic products and is responsible for overseeing the Program on behalf of its stewards, who are identified by the Regulation as "First Seller." The Program operates according to the Bylaws approved by the Board to manage the affairs of the Association. The Board of Directors has the responsibility for the overall stewardship of the organization and establishing the policies and standards for the organization. An electronics recycling program has operated in Saskatchewan since February 2007.

The EPRA Board provides oversight of the programs and ensures that each provincial program, including Saskatchewan, have separate reporting; are adhering to the provincial regulations; and have separate metrics and financial reports by province. In addition, EPRA has a Local Advisory Committee (LAC) in Saskatchewan which contributes to a clear and distinct focus on the provincial program.
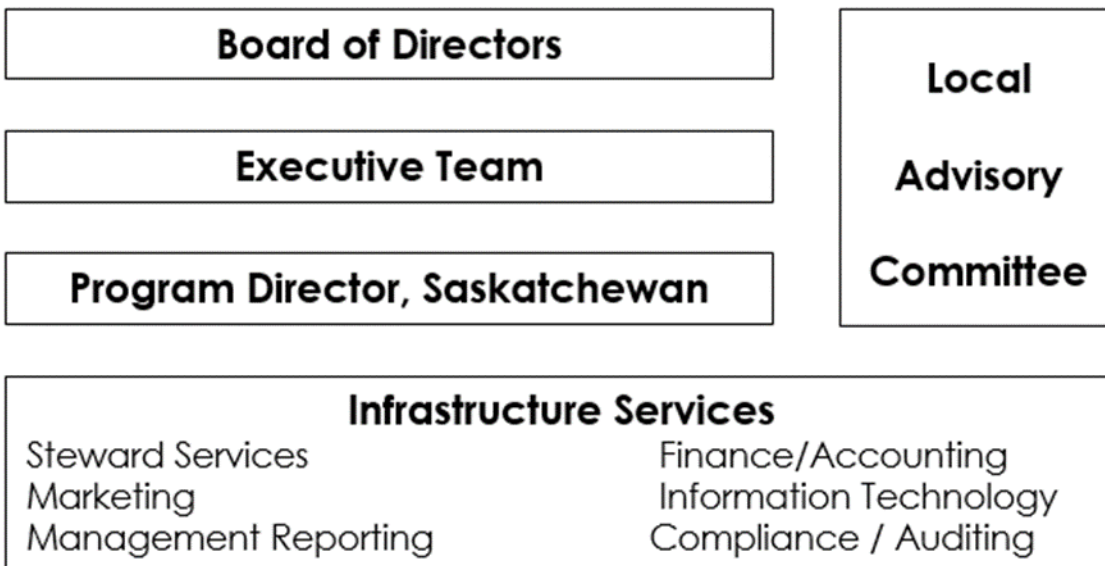
Each of the program's stewards appoint EPRA as their stewardship agency as described in Section 4 of the Regulation. EPRA supports and reports on the range of pollution prevention elements on behalf of its stewards, including conducting awareness campaigns on these priorities, design for the environment reporting, website information and education modules that are free and publically accessible. For those units requiring recycling, EPRA provides collection services throughout the province and ensures responsible recycling of those products collected.

EPRA Saskatchewan represents over 700 stewards reporting on obligated electronics in Saskatchewan. A list of EPRA's stewards is available at:

https://reporting.recyclemyelectronics.ca/index.php?process=extranet_members_list

Information about the Program is available to our stewards on our website at:

https://www.recyclemyelectronics.ca/sk/stewards/

5.1 Board of Directors

The EPRA Board is comprised of four members of the "manufacturing" community appointed by Electronic Stewardship Canada and four members of the "retail" community appointed by Retail Council of Canada. These Board members represent the Saskatchewan stewards and first sellers in the province. An annual meeting is held to appoint these Directors. The members of the Board may be found in the Annual Report at:

https://www.recyclemyelectronics.ca/sk/resources/annual-reports/

5.2 Local Advisory Committee

EPRA chairs a Local Advisory Committee (LAC) to foster the exchange of information on our program and as a forum to discuss issues of local concern. This committee has Saskatchewan-based representatives who have experience with the electronics and/or recycling industry. Committee members are selected by the Saskatchewan Director and form a representative group that is knowledgeable of the industry and can provide meaningful input on the program. The Director is empowered to action those issues which can improve program performance. The EPRA Saskatchewan LAC draws on representatives from the local government, NGO's, local retailers, and other relevant parties.

6 Program Details

This section details the collection, transportation, processing, and monitoring activities managed by EPRA. EPRA's goal is to provide a convenient, safe, and environmentally responsible collection network which is open to all residents of Saskatchewan. EPRA will maintain a network of collection sites across the province, with a transportation network to move materials from the collection points or consolidation centres to the audited and approved recyclers for processing. EPRA will continue to conduct regular reviews to ensure the network meets the needs of Saskatchewan residents.

Materials are collected, consolidated, and recycled under contractual agreements with business entities that are required to meet EPRA's program requirements for the safe, secure, and environmentally sound handling of the materials. Electronics recyclers will be audited to the requirements of the Electronics Recycling Standard (ERS), and must be pre-approved under the Recycler Qualification Process prior to use for processing program materials. The certification, audit, and approval process will help to ensure that the most capable and qualified recyclers are considered for use, in addition to other factors such as process capacity, distance to transport, and cost to process.

The ERS standard may be found at:

http://rqp.ca/wp-content/uploads/2016/12/2.-ERS-2015-V3-16.12.29.pdf

The Program has contractual agreements with service providers to ensure they fulfill the needs of the Program. Agreements include attention to:

- Compliance with all legislation;
- Worker health and safety;
- Environmental protection; and
- Data security.

6.1 Collection, Transportation, and Consolidation

Since commencing operation in February of 2007, the Program has established a comprehensive network of permanent collection locations where the public can conveniently

return electronics covered by the Regulation for responsible recycling. There is no cost to the public for drop-off of program material. This network currently consists of a group of SARCAN Recycling depots, local municipal governments, and other businesses.

In 2016, this network had expanded to 87 collection sites providing convenient access throughout the province. There are also a number of voluntary Return to Retail (R2R) locations across the province to further enhance consumer convenience. In addition, we have options for Large Volume Generators to have their material picked up directly by the Program.

Finding a drop-off location is easy for the consumer. They can simply enter their location or postal code on our website: https://www.recyclemyelectronics.ca/sk/

The network outlined above services over 90% of the Saskatchewan population, however, EPRA also works with rural, remote, and First Nations communities where reasonable options are available, including periodically participating in collection events to augment the network and enhance consumer convenience.

EPRA will:

- Collect program-covered devices across the province;
- Use a network of drop-off sites to provide adequate, appropriate, and convenient drop-off service to Saskatchewan residents. Current EPRA authorized locations can be found at: https://www.recyclemyelectronics.ca/sk/where-can-i-recycle/
- Ensure collection locations adhere to the EPRA requirements;
- Continue to operate a Large Volume Generator (LVG) Program that will arrange for transportation from locations that meet the program's requirements and are sourced within Saskatchewan
- Continue to provide a voluntary Return to Retail (R2R) program for steward retailers;
- Monitor collection sites for effectiveness and compliance;
- Arrange transportation of the collected materials from collection location or consolidator to a processing site.
- Provide to all drop-off locations, a list of accepted products under the Program, which will include orphan and historic products.

To ensure that the collection network is adequate, appropriate, and convenient, EPRA has established the following criteria for service:

- Locations shall be strategically located to maximize the number of Saskatchewan residents served at a reasonable cost;
- All drop-off locations shall have sufficient floor space to accommodate the safe and efficient handling and storage of program materials accepted;
- All drop-off locations shall accommodate scheduled drop-offs of large quantities of program materials. Exceptions must be approved by EPRA.

The EPRA toll-free helpline, as well as email, are used as the primary tools/channels to receive, reply to, and monitor public and steward feedback on both geographic/population coverage and customer service levels provided by our drop-off location network.

With respect to geographic/population coverage, EPRA conducts regular reviews to ensure the network meets the needs of Saskatchewan residents.

6.2 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 currently issues an annual Design for Environment (DfE) Report (available here: http://epsc.ca/design-for-the-environment-report/), which highlight the industry's progress related to design for the environment, along with the many technological advances that are creating change in electronics design. EPRA will report annually on design for environment issues as available through this research.

Reuse: Reusing electronic products is promoted through the communications and public awareness program where markets and opportunities for reuse in-province exist. Many of our stewards have programs for recovering useable electronics fore refurbishment and resale. In addition, there are a number of market options available for consumers to resell (or gift) used electronics. Finally, there are commercial and non-profit organizations which recover and resell used electronics.

EPRA promotes the reuse of unwanted electronics as a first option wherever possible. Residents are encouraged to take all precautions to delete or otherwise protect personal data first and then reuse electronics through the informal peer reuse network, or through one of EPRA-audited and approved reuse organizations. Reusing electronic products is promoted through the communications and public awareness program where markets and opportunities for reuse in-province exist.

EPRA has established the Electronics Reuse & Refurbishing Program (ERRP) as a means to define the minimum requirements for reuse organizations seeking to be recognised under the Program. The ERRP includes requirements for the safe, secure, and environmentally-sound reuse of electronic items. Organizations that are audited and approved by EPRA under the ERRP will be promoted as recognized program partner. EPRA will work with the local entities to understand the requirements of and attain approval under the RRP. Obligated products that are used or refurbished will not attract an EHF,

Recycle: Recycling, which diverts electronics waste from landfill and illegal export, is a major focus of this program. Typically, recycling involves some form of "primary" or initial processing, which may include dismantling and sorting of material by hand or by more elaborate mechanical means. Further manual or mechanical separation of materials by another vendor or vendors is considered "downstream" processing. Both Primary and Downstream recyclers are audited and approved in accordance with the Electronics Recycling Standard (ERS) to ensure that materials are handled in a safe, secure, and environmentally sound manner.

6.3 Standards and Procedures for Reusers and Recyclers of End-of-Life Electronics

To ensure that residents are directed only to reuse organizations that operate audited and approved processes with adequate safety, security, and environmental controls, EPRA will promote only those reuse organizations that have been audited and approved under the ERRP.

To ensure that all materials collected under the program are responsibly recycled, EPRA contractually requires all recyclers to meet the requirements of the 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.

All audits of program reusers and recyclers will be conducted by the Recycler Qualification Office (RQO), in accordance with the requirements of the defined program. Reusers and recyclers that successfully complete the audit process and are approved under the program will be listed on the RQO's website.

Additional information on the ERRP, ERS and the broader Recycler Qualification Program can be obtained at www.rqp.ca.

At the time of filing this PSP there are currently no processors located in Saskatchewan, but EPRA would consider using Saskatchewan-based processors if they provided competitive solutions.

6.4   Environmental Standards

EPRA logistics planning includes consideration for efficiency and minimizing transportation and other GHG causing processes. Specific initiatives that directly contribute on this commitment include:

- Leveraging depot space through a strategic partnership with SARCAN to operate shared drop-off depot locations, maximizing the footprint of heated facilities;
- Leveraging the transportation from depot to consolidation centre with SARCAN's other collected recycling materials, thereby reducing transportation by ensuring maximized loads with other safe recycling materials;
- Minimizing transportation by utilizing full truck loads to processor, wherever possible. This optimized logistics strategy minimizes the number of trucks required to transport EOLE to recycling facilities;
- Minimizing automobile traffic while encouraging recycling by maintaining a network of drop-off locations that provides more than 85% of Saskatchewan residents with access to EOLE recycling with 50 kms (rural) and 30 min (urban) of their homes.
- Developing a methodology to reasonably quantify the EOLE collection, transportation, and processing activities in terms of environmental impact.

6.5   Steward Compliance

The Program will maintain an enforcement and compliance procedure that demonstrates steps to ensure regulatory requirements and a level-playing field among stewards responsible for a designated waste stream.

7   Program Funding

7.1   The Environmental Handling Fee

The program is funded by an EHF that is levied on new product sales of the items designated by the Regulation. The EHF will allow drop-off of EOLE products at designated drop-off locations at no charge with the assurance that these items will be responsibly recycled.

7.2   Setting the Environmental Handling Fee

EPRA is a not-for-profit entity. Through sound program management and regularly reviewing the EHF, the organization ensures all fees go to delivering an efficient, effective, and compliant program that can reliably fulfill the recycling responsibility in both strong and weak economic periods. The fees are set by category rather than a blanket fee, a refinement that reflects the categories of reporting and remitting. It is important to note that EPRA monitors revenue generated by the program to ensure that funds will be sufficient to fund all the program activities including the recycling of collected material from manufacturer's no longer in business, also

known as orphaned products. The EHF review regularly assesses the cost elements which must be considered when adjusting the EHF's, including:

- Collection;
- Handling;
- Consolidation;
- Transportation;
- Recycling;
- Communications and public awareness;
- Administration
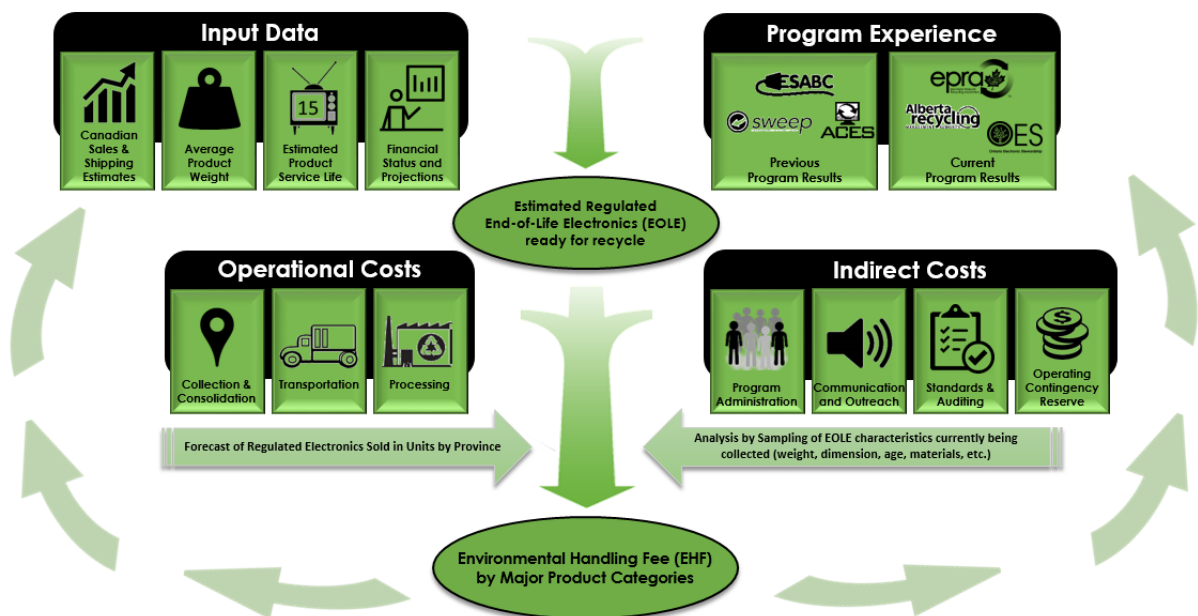
EPRA engages with stewards for regular updates and solicits formal feedback throughout the year on all aspects of the program including fees and fee changes. The Program has committed to our Stewards to provide reasonable notice of any substantive EPRA program amendments or changes and provide, where possible, ninety (90) day's advanced notice of any change to the EHF. EPRA also will communicate, with notice, to the Ministry of Environment of these types of changes.

The EHF's that are charged cover the costs to safely and securely recycle the electronics that are collected in the province today. EPRA regularly reviews revenue generated by the program to ensure that funds are sufficient to fund all of the program activities. If there is an opportunity to reduce an EHF, or a need to increase an EHF, the program will action accordingly. The program shall be audited annually by an independent external auditor.

8   Communications and Public Awareness

Annually EPRA will develop and roll out a communications plan with the following areas of focus:

- Create awareness of the EPRA Program, in particular the electronic products that will be accepted and where to take them for responsible recycling;
- Create awareness of environmental and data security risks associated with electronics not being properly managed;
- Ensure that the electronics products brand owners and retailers of regulated products are aware of their obligations related to the EPRA Program in Saskatchewan. Invite participation in the EPRA program in order for the steward to easily and responsibly comply with the regulation;
- Ensure EPRA drop-off locations continue to be well informed regarding electronic products included in the Program and can provide accurate information to customers.
- Conduct annual polling of Saskatchewan residents to measure the effectiveness and reach of communication and public awareness.

To accomplish this, a variety of communication materials will be deployed to facilitate education and awareness of the EPRA Saskatchewan Program.

- EPRA provides signage to the network of drop-off locations;
- Promotional material (for example, brochures and tent cards) are made available for electronic product retailers to order and display. Examples of these can be found at: http://epra.ca/epra-communications-and-point-of-sale-materials-western;
- Encouraging residents, businesses, and schools to utilize our web site at: https://www.recyclemyelectronics.ca/sk to find out where and what to recycle and learn about why everyone should recycle their EOLE.

9 Reporting

9.1 Annual Report

In line with Section 9 of the Regulation, Annual Reports will be submitted to the Minister on or before June 30 in each year covering January 1 to December 31 of the prior year. This report will include (see Appendix A for example of scorecard):

- The type and total amount of waste electronic equipment collected by weight;
  - Weight will be broken down into Displays and Other;
- Confirmation that proper disposal of material and 3R hierarchy has occurred through only ERS-approved processors;
- The total amount of recycling fees collected to fund the program in Saskatchewan;
- The amount spent to operate the program in Saskatchewan;
- The amount paid out as recycling incentives, if any;
- The costs incurred to administer the program;
- The amount spent on public education or public awareness and communication.

9.2 Performance Measurements and Continuous Improvement

EPRA has committed to annually report on a core set of measurements which may include:

- Operations
  - Report on cost of operations and develop a GHG performance indicator
- Accessibility
  - Maintain 90% of the Saskatchewan population being within 50 kms (rural) or 30 minutes (urban) of an EPRA drop off centre.
- Awareness

- o The Program goal is to maintain strong consumer awareness with a goal of 70% of the Saskatchewan population being aware of a place to recycle unwanted electronics in an environmentally friendly way.
- Financials
  - o The Program will include audited financial statements with each Annual Report as prepared by an external auditor.
  - o Cost per tonne will be reported, as well as a Schedule of Operations

Key topics to be reviewed on an ongoing basis include:

- The evolution of obligated products to ensure the industry is current with changes in the marketplace and the end-of-life stream. This includes the rapid move to smaller, lighter weight devices and multi-function devices.
- Electronics waste management developments.

10 Dispute Resolution

The Program has incorporated normal commercial dispute resolution provisions into contracts with third parties. EPRA addresses disputes with service providers through internal review and any unresolved disputes are addressed using standard commercial legal procedures. Depending on the type of dispute, the resolution process may include the following methods:

- Collaborative resolution;
- Mediation;
- Arbitration.

11 Audit Systems

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

11.1 Auditing of Obligated Stewards

Overview

Detailed audits of remitters (stewards) 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 behaviour, random selection, and with the intention that all remitters are audited at some point within a 5-year period.

Audit Procedures

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

11.2 Auditing of Recyclers

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

The ERS is periodically reviewed and revised by Electronics Product Stewardship Canada (EPSC) to ensure that it satisfactorily meets the needs of the evolving electronics recycling industry. In order to better align and harmonize the standard internationally, the ERS was updated in 2015 and currently includes the internationally recognized R2 certification as a prerequisite.

As part of the R2 certification process, the recycler is required to attain certification by an independent accredited certification body of their environmental, health, and safety management system to either the RIOS standard or both the ISO 14001 and OHSAS 18001 standards.

The R2 certification will be audited and administered by a SERI-approved third party certification body. The Recycler Qualification Office (RQO) will continue to audit the additional elements of the ERS as contained in the RQP.

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.

The ERS is reviewed periodically and updated with standards and protocols that contribute to a safe and secure standard.

The ERS, as well as the list of approved primary recyclers can be found at: www.rqp.ca.

12 Review of Product Stewardship Program

This Product Stewardship Program will be reviewed by EPRA every five (5) years after the date of the approval of the program and EPRA will either:

- Seek approval from the Minister of any proposed amendments to the approved Program; or
- Notify the Minister in writing that no amendments to the approved Program are proposed.

Appendix A – EPRA Saskatchewan 2016 Key Performance Indicators (KPIs):

EPRA Saskatchewan

Collection
Operational Indicators

Measures related to the weight of regulated electronics collected by the program for recycling.

End-of-Life Electronics Collected

2,529 tonnes
Tonnes collected.

2.3 kg/capita
Kilograms collected per capita.

Access
Collection Accessibility and Convenience Indicators

Measures related to the convenience of accessing the program to have regulated electronics recycled.

Collection Site Coverage and Convenience

93%
% of the Saskatchewan population within 50 kms (rural) or 30 minutes (urban) of an EPRA Sask Drop-off Centre.

87
Total collection sites.

Awareness
Public Awareness and Industry Participation Indicators

Measures related to the public's awareness of the program, and the participation of obligated industry stewards in the program for environmental regulatory compliance.

Public Awareness and Industry Participation

84%
Percentage of the population aware of the e-recycling program.

734
Total manufacturers, retailers and other industry stewards registered with EPRA Saskatchewan.

Cost
Financial Indicators

Measures related to the costs of delivering the program, including collection, consolidation, transportation, audits, processing, administration, communications, management and professional fees.

Program Costs

$1,349 per tonne
Total program cost per tonne.

This scorecard lists the harmonized Key Performance Indicators (KPI) which EPRA's regulated, industry-led electronics stewardship programs operating in 2016 in Canada have committed to report on, as per "Research and Recommendations for Performance Measures For Regulated, Industry-Led, End-of-Life Electronics Recycling Programs in Canada" (Intergroup Consultants Ltd, April 2010). These measures reflect data which is presented in each program's annual report and/or other public reporting.

PROVINCE OF SASKATCHEWAN
MINISTRY OF ENVIRONMENT
MINISTERIAL APPROVAL OF A PRODUCT STEWARDSHIP PROGRAM

ELECTRONIC PRODUCTS RECYCLING ASSOCIATION

WHEREAS:

A. Electronic products are prescribed products for the purposes of clause 46(a) of *The Environmental Management and Protection Act, 2010.*

B. Pursuant to *The Electronic Equipment Stewardship Regulations* (the Regulations), no first seller shall fail to operate a Product Stewardship Program approved by the Minister of Environment; or enter into an agreement with a person to operate, on the first seller's behalf, a Product Stewardship Program approved by the Minister.
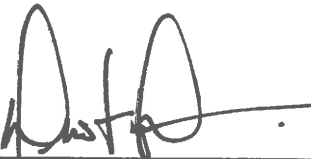
MINISTERIAL APPROVAL is hereby given to the Electronic Products Recycling Association (EPRA) of Mississauga, Ontario, hereinafter called the Applicant, to operate a Product Stewardship Program (PSP) in the Province of Saskatchewan in accordance with the following terms and conditions:

1. The Applicant shall operate the PSP in accordance to the proposal dated April 30, 2018, submitted by EPRA Saskatchewan;

2. The Applicant shall advise the Ministry of Environment of any change in content of the PSP upon which this approval is granted and shall obtain prior approval for any such change;

3. The Applicant shall maintain on its corporate website (www.epra.ca) a current list of active first sellers conducting business in Saskatchewan. These will be identified as being members of EPRA and, thereby, approved first sellers in Saskatchewan.

4. The Applicant must develop a compliance plan and procedure jointly with the Ministry of Environment. The plan shall be in place within six months of the program expansion on May 1, 2018.

5. The Applicant must provide the Ministry of Environment a written analysis describing the program's ability or limitations to report by types of equipment listed in Table 1 of the Regulations and amount of waste electronic equipment collected and diverted to each of the program's recycling options pursuant to clause 9(3)(a) and (b). The analysis must be submitted within six months of the date of this approval.

6. The Applicant must develop a greenhouse gas emissions measurement and management plan related to the collection and recycling of waste electronic equipment pursuant to clause 5(2)(b)(xii) of the Regulations. The plan shall be approved by the Ministry of Environment before December 31, 2018, for implementation in 2019 and reported in the program's 2019 annual report.

7. This approval takes effect on the date of signing.

Dated at Regina, Saskatchewan this _____20_____ day of _____June_____, 2018.

APPROVED BY: _____

Dustin Duncan
Minister of Environment