



Waste Electrical and Electronic Equipment

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

March 31, 2008

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1.0 Background

The Waste Diversion Act (WDA), 2002 empowers the Minister of the Environment to designate a material for which a waste diversion program is to be established. Once the Minister has designated a material through a regulation under the WDA, the Minister directs Waste Diversion Ontario (WDO) to develop a diversion program.

WDO, a non-crown corporation, was established under the Act to develop, implement and operate waste diversion programs for a wide range of materials. To date, the Minister has requested diversion programs for Blue Box Wastes, Used Tires, Used Oil Material, Waste Electrical and Electronic Equipment (WEEE) and Municipal Hazardous or Special Waste (MHSW).

WDO is required by the Act to develop the Waste Diversion Plan for the designated waste in co-operation with an Industry Funding Organization (IFO). WDO is further required by the Act to conduct public consultation on any matter referred to it by the Minister.

On December 20, 2004, the Minister filed a regulation under the WDA designating WEEE.

On, June 11, 2007, the WDO Board of Directors received a Final Program Request Letter from the Minister of the Environment requesting a diversion program for WEEE. The Program Request Letter required the WDO to designate an IFO for WEEE. It also outlined program requirements and requested a Consultation Plan.

In response, WDO developed a [Consultation Plan to Support the Development of a Diversion Program for Waste Electrical and Electronic Equipment](#) and conducted the first phase of

consultation, specifically Workshop and Webcast # 1 on June 26, 2007.

On September 20, 2007, Ontario Electronic Stewardship (OES) was incorporated and on October 17, 2007, it was approved by WDO as the IFO for WEEE. OES is responsible for implementing this Consultation Plan and managing the development and implementation of the WEEE Diversion Program Plan, in co-operation with WDO.

This is the fourth version of the Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan. The original WDO Consultation Plan is included as Appendix I of this document. The second consultation document has been posted to the OES website for comment along with the Draft Preliminary WEEE Program Plan on January 11, 2008. The third document, OES Program Plan Development Consultation Paper, was first posted to the OES website for comment on February 11, 2008. It has been updated at milestones along the plan development and consultation process. The OES website address is www.ontarioelectronicstewardship.ca.

2.0 Objectives and Scope

WDO has directed OES to develop and implement a consultation process that is thorough and ensures a beneficial exchange of information, ideas and opinions, among those who may be affected by the development and implementation of a diversion program for WEEE.

A number of parties were considered to be stakeholders in this process, including the stewards which include electrical and electronic equipment (EEE) brand owners, first importers and/or assemblers of non-branded products for

sale and use in Ontario that result in WEEE, as well as the industry associations that support their work. Additional interested stakeholders included affected industries; municipalities; environmental and community groups with a particular interest in waste management, water quality and public health issues related to the life cycle of EEE; industrial, commercial and institutional generators of WEEE; professionals working in related fields (e.g. environmental consultants); and the general public.

The Addendum to the Minister's Program Request Letter prescribed the obligated WEEE for Phase 1 and Phase 2, and made reference to future phases of the program. Stewards of obligated materials under Phase 1, Phase 2, and future phases, as well as stakeholders interested in these materials were encouraged to participate in the consultation process for the development of a diversion program for Phase 1 Consultation Plan to support the development of the Waste Electrical and Electronic Equipment Diversion Program Plan.

Within one year after the Minister approves Phase 1 of the program, a proposal for Phase 2 is to be submitted to the Minister.

The Phase 1 and Phase 2 materials identified in the Minister's Program Request Letter do not represent the full range of WEEE materials in Ontario Regulation 393/04. The Minister may direct WDO to include additional WEEE materials in future phases of a WEEE program.

While this Consultation Plan was being implemented, the plan development process also included:

- Periodic review of information arising from the consultation process and related to WEEE plan

- development by the OES Board and those WEEE stewards directly involved with OES in plan development;
- Periodic review of information arising from the consultation process and related to WEEE plan development by the WDO Executive Director and WDO Board; and
- Periodic meetings among WDO staff, OES and Ministry of the Environment staff and legal counsel.

3.0 Key Participants in Consultation

The consultation process targeted five key audiences:

3.1 Industry Stewards

Stewards

This group referred to EEE brand owners, first importers and/or assemblers of non-branded products supplied in Ontario that result in WEEE, who will register with the IFO (or implement their own Industry Stewardship Plan as allowed under the Act) upon approval of the WEEE Program Plan.

Industry and Trade Associations

Industry and trade associations may assist in the identification and notification of individual company representatives, their members. These associations included but were not limited to:

- Electronics Product Stewardship Canada (EPSC)
- Information Technology Association of Canada (ITAC)
- Retail Council of Canada (RCC)
- Canadian Council of Grocery Distributors (CCGD)
- Electro Federation Canada (EFC)
- Medical Imaging and Information Systems Council (MIISC)

- Information Technology Association of Canada
- Canadian Wireless Telecommunications Association
- Entertainment Software Association of Canada
- Association of Home Appliance Manufacturers
- Product Care Association
- Canadian Welding Association
- Canadian Standards Association
- Canadian Toy Association
- Canadian Hardware & Housewares Manufacturers Association
- Heating, Refrigeration and Air Conditioning Institute of Canada
- Industry Canada
- Canadian Chinese Computer Association
- National Association for Information Destruction (NAID) – Canada
- Canadian Standards Association
- Canadian Security Association

3.2 Affected Industries

Representatives of other industries that might be affected by the development and implementation of a diversion program for WEEE included:

- distributors of products that may result in WEEE
- companies providing repair services for Electrical and Electronic equipment
- retailers of products that may result in WEEE
- assemblers of EEE
- generators of WEEE (as defined in Ontario Regulation 393/04)
- private companies providing collection of WEEE
- transporters of WEEE
- end markets for processed WEEE
- reusers of WEEE

- refurbishers, resellers and redistributors of WEEE
- processors and recyclers of WEEE
- operators of disposal facilities for WEEE
- professionals working in related fields

Industry associations representing these affected industries were included in the consultation process. These associations included:

- Canadian Association of Recycling Industries
- Ontario Waste Management Association
- Ontario Environmental Industries Association

3.3 Municipalities

Some municipalities operated permanent WEEE depots or provide special WEEE events while other municipalities do not provide this service. Consultation with both types of municipalities was important in developing an understanding of the role of municipalities in the delivery of a WEEE program. Municipalities or representatives of municipalities included:

- Association of Municipalities of Ontario (AMO)
- City of Toronto¹
- Association of Municipal Recycling Co-ordinators (AMRC) - *Recycling services offered by Ontario municipalities are typically managed by recycling co-ordinators. These recycling co-ordinators are responsible for municipally-operated MHSW collection systems.*
- Municipal Waste Integration Network (MWIN) - *Municipal recycling co-ordinators also receive information through MWIN.*

¹ City of Toronto is not a member of AMO

- Rural Ontario Municipal Association (ROMA)
- Federation of Northern Ontario Municipalities (FNOM)

3.4 General Public

Residents of Ontario are consumers of electrical and electronic equipment, either individually or through their place of business, and have a direct interest in the development of a diversion program for these products.

There are two elements of the general public: those members of the public who are already engaged in the issue, either through direct involvement in WEEE management or other waste management issues; and those members of the public who have no awareness of the challenges involved with end-of-life management of electrical and electronic equipment.

It was important to engage members of the public in the process of designing a provincial plan to ensure the effective and environmentally sound management of WEEE. This will include environmental and consumer groups with a strong interest in waste diversion, issues related to public health that may concern the life-cycle of EEE, water quality, and environmental policy. The organizations include:

- Consumer Association of Canada - National office
- Canadian Institute for Environmental Law and Policy (CIELAP)
- Environmental Law Students Association (ELSA)
- Ecojustice
- Clean Air Foundation
- Citizen's Network on Waste Management
- Ministry of the Environment
- Pollution Probe
- Canadian Security Association

- Ontario Society for Environmental Education
- Sustainability Network
- The Ontario Environment Network
- Toronto Environmental Alliance
- Ontario Ministry of Economic Development and Trade
- Industry Canada
- Saskatchewan Waste Electronic Equipment Program
- Alberta Recycling Management Authority
- Recycling Council of Ontario (RCO)

It also was considered important to educate members of the public who were not aware of the end-of-life WEEE management implications, and provide them with information about diversion program plan development and the consultation process.

The consultation process recognized the particular challenges of reaching members of the public who reside in northern and remote communities through use of local media and the ability for participation in workshops via webcast.

4.0 General Elements of Consultation

The consultation process contained the following elements:

4.1 WDO Website

The WDO website was used to outline the consultation process and schedule, post consultation documents for comment and receive comments from industry, municipalities and the general public.

4.2 IFO Website

The Ontario Electronic Stewardship website was dedicated to WEEE program development. The website was used to

outline the consultation process and schedule, post consultation documents for comment and receive comments from industry, municipalities and the general public.

4.3 Database of Identified Stakeholders

An inventory of identified stakeholders had been created in database format and was used to inform the stewards and stakeholders of the consultation activities.

4.4 Electronic Notice to Identified Stakeholders

Electronic notices outlining the consultation process, schedule and key dates for meetings and comments were distributed to stakeholders.

4.5 Consultation Paper

Stakeholder consultations that involved technical or economic complexities were anchored in a background paper that was regularly updated throughout the process to reflect the state of consultation. The consultation paper was available on the websites.

4.6 Consultation Workshops/Webcasts

Issues have been presented to stakeholders at three workshops that were simultaneously webcast. Questions and comments were solicited from meeting and webcast participants during the event. Information presented at workshops and questions asked by participants were available via archived webcasts for a minimum of 90 days. The following described the topics discussed at each workshop/webcast.

Workshop/Webcast # 1 – June 26, 2007

Subjects discussed included:

- Waste Diversion Act
- Waste Diversion Ontario
- Regulation Designating WEEE
- Final Program Request Letter
- Revisions to Consultation Plan
- Q&A on all topics

Comments were requested on the draft Consultation Plan and the governance proposal. Comments received following Workshop/Webcast # 1 were considered when finalizing the Consultation Plan.

Workshop/Webcast # 2 – October 12, 2007

Subjects discussed included:

- Definition of Obligated Materials
- Designated Stewards
- Phase 1 Preliminary Projections
- Current WEEE Diversion Activity
- Collection and Diversion Options
- Recycling Vendor Qualification Requirements
- Key Program Elements
- Consultation Process
- Q&A on all topics
- Processor Meeting
- Collector Meeting

Comments were requested on the baseline data and plan options. Comments received following Workshop/Webcast # 2 were considered when preparing the draft preliminary program plan.

Posting Draft Preliminary Program Plan

Following Workshop/Webcast # 2, OES posted a Draft Preliminary WEEE Diversion Program Plan on its website. (This plan was posted on January 14, 2008.) Within 15 days of publication of the proposed plan, OES held Workshop/Webcast #3 to explain its proposed program plan to stakeholders and for interested stakeholders and members of the public to provide comment.

Workshop/Webcast # 3 – Draft Preliminary Program Plan – January 24, 2008

Subjects discussed included:

- Draft diversion program plan for WEEE
- Issues raised during consultation and how they were addressed in the diversion program plan
- Process to submit comments on the draft preliminary plan
- Plan budget
- Setting stewards' fees
- How to prepare to meet obligations

Comments on the draft preliminary program plan were due by end of day, February 4, 2008, comments on the draft final program plan were due on February 22, 2008. Both sets of comments have been considered in preparing the draft final program plan.

4.7 Plan Submission and Explanation of Results

Ontario Electronic Stewardship considered all comments received to date from stakeholders and amended the draft final WEEE program plan as appropriate, based upon the comments. The draft final plan includes responses to significant comments received during the consultation process, regardless of whether the comments were incorporated into the draft final program plan. This consultation document includes an accounting of how the comments were considered in the preparation of the subsequent versions of the draft final program plan. A table indicating responses is included in Appendix I.

OES will submit the draft final program plan to WDO for review, post the draft preliminary program plan on its website and provide notice to all stakeholders regarding the posting. The WDO will also post the draft final program plan on its website.

4.8 Comments to WDO

Once the draft final program plan has been submitted to WDO, affected stakeholders and members of the public may submit comments on it directly to WDO if they believe the plan does not adequately take into account comments submitted during the consultation process. WDO will consider any such comments when it is evaluating whether to approve the plan and forward it to the Minister for final review and approval or to request that Ontario Electronic Stewardship modify the program plan.

5.0 Consultation with Industry Stewards

In addition to the general elements listed above, the consultation process with industry stewards and stakeholder continued on a regular basis. To date, OES distributed ten electronic newsletters, advising of opportunities to attend consultation sessions and timetables for reviewing and commenting on draft program plan and other documents. The electronic newsletters have been widely distributed to industry associations to provide information to their members on the consultation process and schedule (in accordance with the original WDO Consultation Plan).

Similarly, OES has distributed two news releases to Ontario and national business media outlining the consultation process and schedule, with a special focus on workshop and webcast # 3 to advise members of the public of the process to develop a WEEE program plan and the opportunity to submit comments. The media releases were distributed to 608 daily and community newspapers, radio and television stations and trade publications. This resulted in media interviews with a range of media including Global TV, CBC radio (English and French), the Globe and Mail, Carlton Business Magazine, Sarnia Observer and an inquiry from the North Bay Nugget.

A notice on the OES website invited interested parties to be placed on the WEEE mailing list resulting in a dozen additional individuals and organizations availing themselves of the opportunity to be included in the consultation process.

6.0 Consultation with Affected Industries

Affected industries were encouraged to participate in the consultation process outlined in Section 4. In the event that the three workshops proved inadequate to deal with sectoral issues arising from the affected industries, additional working

groups were formed to address any specific issues that could not be covered through direct submissions.

Webinar meeting with (EOL) end-of-life processors of electrical and electronic waste.

On Monday, February 18, 2008, Ontario Electronic Stewardship held a webinar/meeting attended by more than 30 end-of-life processors of electrical and electronic waste. The meeting featured a presentation by the OES team and encouraged feedback on the *draft program plan*. Details of this meeting are provided in Appendix III.

Further end-of-life processor consultation took place between March 4th and 9, in the way of one-on-one discussions to probe particular comments and questions regarding the revised allocation approach described in the draft program plan.

Participants in one-one conversations included:

- David Betts, eCycle Solutions
- OERRA²
- Jason Lim, Toronto Recycling

7.0 Consultation with Municipalities

In addition to the general elements listed in Section 4, the consultation process with municipalities has contained the following elements:

- AMO, AMRC, MWIN and RCO have been provided information to keep their members apprised of

² Participants included Dennis Maslo, Computation; Dana Wright MaSer Corporation; Len Shaw, CARI; Mario D'Alfonso, ADL Process Inc.; Usman Valiante, Corporate Policy Group

consultation stages. Materials have included contact persons for further information.

- Notices to Municipalities: Municipalities have been notified directly that materials are available via the websites.

Municipal issues raised during the workshops/webcasts were addressed through discussions with representatives from affected municipalities and/or with representatives from the Association of Municipalities, City of Toronto (which is no longer a member of AMO), Rural Ontario Municipal Association and Federation of Northern Ontario Municipalities.

WDO coordinated a municipal WEEE task group that included representatives from nine municipalities, AMO, AMRC and OES. The task group met eight times between program start-up through January 2008.

8.0 Consultation with General Public

In addition to the general elements listed in Section 4, the consultation process with the general public contained the following elements:

- Preparation of Background Information Paper: It was assumed members of the public would require background information in preparation for informed participation in the consultation process. A background paper containing information on the Waste Diversion Act, Waste Diversion Ontario, the Minister's letter requesting a diversion program for WEEE, the environmental benefits of designating WEEE, a description of the consultation process and contact information was prepared and posted on the OES and WDO websites. The information has been available in both print and electronic format.

Print copies are provided by WDO and OES upon request.

- Websites: The availability of the background information package and details regarding the development of the program plan were posted on the WDO and OES websites.
- Press Releases: Press releases were issued to notify the public of the availability of the WEEE Program Plan on the websites and the opportunity to comment.
- E-Newsletter: over the period of the development of the draft program plan, OES distributed 10 issues of its electronic newsletter to a broad range of potential stewards and stakeholders.
- Online Survey: An online survey was available for participants of workshop/webcast #3 for additional comment responses during the consultation processes.
- Notices to identified community interest groups: Identified interest groups were notified directly that materials were available via the websites. These groups included:
 - Canadian Institute for Environmental Law and Policy
 - Citizen's Network on Waste Management
 - Clean Air Foundation
 - Consumers' Association of Canada
 - Environmental Educators of Ontario
 - Ontario Environment Network
 - Pollution Probe
 - Recycling Council of Ontario
 - Sierra Club of Canada
 - Sustainability Network
 - Toronto Environmental Alliance

Meeting with Non-Government Organizations (NGOs)

On Monday, December 17, 2007, Waste Diversion Ontario met with representatives of a number of NGOs to discuss

with them the process that was underway to develop the draft preliminary plan for WEEE. The participants were:

- Ken Bondy, CAW-TCA Canada
- Maureen Carter, Canadian Institute for Environmental Law and Policy
- John Jackson, Citizen's Network on Waste Management
- Brennain Lloyd, Northwatch
- Elaine McDonald, Eco Justice
- Rod Muir, Sierra Club of Canada
- Jo-Anne St. Godard, Recycling Council of Ontario
- Carolyn Webb, CEILAP
- Jessica Zippin, Clean Air Foundation

Ontario Electronic Stewardship

Gordon Day – CSR

WDO Executive Director, Glenda Gies, summarized the designation of Waste Electronics and Electrical Equipment (WEEE), the request from the Minister and the establishment of the IFO, Ontario Electronic Stewardship (OES). She referenced Workshop # 1 and Workshop # 2, indicating that archived webcasts from these two workshops were available via links from WDO's and OES's websites.

OES Plan Development Project Manager, Gordon Day, described the OES program design flow chart:

- Stewards (brand owners, first importers and assemblers) sell Electrical and Electronic equipment (EEE) to consumers who may chose to direct these items to one of four types of collectors
 - municipal collection sites contracted to OES
 - other collection sites, such as retailers, not for profits (e.g. Salvation Army stores), waste haulers, contracted to OES

- for-profit and non-for-profit organizations, contracted to OES, that refurbish and reuse WEEE
- original equipment manufacturers (OEMs) that accept WEEE from their customers
- Separate meetings were held with a Municipal WEEE Task Group to consider logistics and other arrangements between OES and municipalities
 - method of packing for shipment
 - payment for collection
- OES issued a Request for Expressions of Interest (REOI) to identify other organizations possibly interested in providing collection services
- Separate meetings were held with organizations currently refurbishing IT equipment to consider logistics and the types of services OES may be able to provide to assist these companies including:
 - profile by listing companies that comply with the reuse vendor standard on the OES website and promotion by informing consumers of the opportunity to reuse (potentially increasing the quantity of items received from which to select items for reuse)
 - paying the organizations for non-reused Phase 1 WEEE collected (providing a new source of income)
 - accepting scrap from refurbishing Phase 1 WEEE for management under the program (removing an existing cost)
 - approving processors and downstream markets, using the OES vendor standards, to which the organizations can send valuable disassembled components (supporting and potentially expanding an existing source of income)
- Noted that WEEE returning to OEMs represents a significant proportion of material currently handled
- Noted that consolidation points are likely required for some areas of the province to ensure sufficient service to

collection points while still accumulating full loads for delivery to processors

- Noted that it is likely that some WEEE will continue to be handled outside of the program although the program will work to increase the quantity managed by the program

Mr. Day then described the preliminary baseline data noting that:

- Data are preliminary and work is on-going to remove duplication and improve accuracy
- Quantity 'available for recycling' was based on modeling using historical sales and assumptions about lifespan and reuse to predict when items will reach their end of life and require management by recycling in 2007
 - noted that information from steward reports to the Alberta program, considered the best data available, were utilized to build the model
- Quantity 'recycled' represents quantity of material received by processors from Ontario sources during 2007
- 'Recycling rate' represents the percentage of material available for recycling that was collected and directed to processing in 2007
 - note that some portion of this material was residue and was therefore not recycled
 - some portion was also likely managed through non-3Rs activities and was therefore not diverted

Issues raised during the discussions:

- Will visible fees be added to EEE at the point of sale?
 - Ms. Gies noted that the WDA did not give WDO or its IFOs authority to levy fees on consumers at point of sale
 - WDO and IFOs may only levy fees on stewards

- Stewards determine how they will manage this new cost within their individual companies; some may choose to pass the cost to consumers as a visible fee while others may pass the cost to consumers in the price of a product while others may absorb some/all of the cost; it is each steward's individual decision
- Issue will not be addressed in the WEEE program plan
- Program should not compromise reuse
- Consumer should not have to pay for reuse, i.e. organizations that currently have to charge for reuse should be able to offer this service for free
- Product design for environment (DfE) should improve as a result of the program
- Materials should be managed by 3Rs not EFW under program

URL Links to Archives of Workshop/Webcasts

Workshop/Webcast # 1: Archive:

<http://www.wdo.ca/content/?path=page80+item126047>

Workshop/Webcast # 2: Archive:

http://www.ontarioelectronicstewardship.ca/consult_workshop2.html

Workshop/Webcast #3: Archive

http://www.ontarioelectronicstewardship.ca/consult_workshop3.html

The following document lists all the stakeholders that have been involved in the WEEE Program Plan development consultation process, either through the submission of comments, attendance at one of the three workshop/webcasts, or both. Please note that the content of the workshop/webcasts can be viewed on Ontario Electronic Stewardship's web site at:

<http://www.ontarioelectronicstewardship.ca/consult.html>

Comments on the Workshop/Webcast #1

Workshop/ Webcast #1

Comment Submission

National Association for Information Destruction (NAID), Duncan Rayner

Workshop/Webcast #1 Participation

ADL Process Inc., Mario D'Alfonso
 Ageus Solutions, Katalin Feszty
 AMO/OGRA, Michael Day
 AMRC, Cynthia Hyland
 AMRC, Vivian DeGiovanni
 Armour Township, Leanne Crozier
 Beveridge & Diamond, Lauren Hopkins
 Bluewater Recycling Association, Wendy Yamamoto-Chapman
 Bruce Area Solid Waste Recycling, Karrie Drury
 Canadian Standards Association, Marsha Cheddi
 Canadian Standards Association, David Zimmerman
 Canadian Tire, Grant Caven
 Canadian Toy Association, Sheila Edmondson
 Canon Canada Inc., Greg Davis
 CIELAP(Canadian Institute for Environmental Law and Policy), Carolyn Webb
 City of Barrie, Tracy Quann-Strasser
 City of Cornwall, Neil Dixon
 City of Guelph, Bill Shields

City of Guelph, Jennifer Molnar
 City of Guelph, Phil Zigby
 City of Hamilton, Colleen Clark
 City of London, Anne Boyd
 City of London, Jay Stanford
 City of North Bay, Al Tomek
 City of Orillia, Greg Preston
 City of Ottawa, Cameron Neale
 City of Peterborough, Virginia Swinson
 City of Sault Ste Marie, Randall Roy
 City of Thunder Bay, Vanessa DeGiacomo
 City of Toronto, Kevin Vibert
 Community Environment Alliance, Ranjana Mitra
 Computation Ltd., Dennis Maslo
 Corporate Policy Group LLP, Usman Valiante
 County of Peterborough, Sherry Arcaro
 County of Peterborough, Mark Cross
 County of Simcoe, Kimberley Pickett
 County of Wellington, Das Soligo
 CSR, Guy Perry
 CSR, Gordon Day
 CWTA, Kasia Majewski
 Deer Bay Advisors, David H. Morgan
 Dell Canada Inc., Rebecca Wellum

Dominion Business Systems, Jim Sanderson
 Electro-Federation Canada, John Bailie
 Electro-Federation Canada, Sandra Dawes
 Electronic Recycler, Lawrence Pazner
 EPSC, Jay Illingworth
 Executive assistant, Lorie Wilson
 Global Electric Electronic Processing Inc. (GEEP Inc.), George Craine
 GEEP International, Greg McWatt
 Global Electric Electronic Processing Inc. (GEEP Inc.), Dave Douglas
 Halton Region, Brenda McCrea
 Hewlett-Packard (Canada) Co., Frances Edmonds
 Hewlett-Packard (Canada) Co., Courtney McLaughlin
 Hewlett-Packard (Canada) Co., Donna Chau
 Home Hardware Stores Limited, David Bois
 Hudson's Bay Company, Peter Skubna
 IBM Canada Ltd., Ed Smith
 IBM Canada Ltd., Garry Travers
 IBM Canada Ltd., Efra Alani
 John McMullen & Associates, John McMullen

Kelleher Environmental, Maria Kelleher
 KIMCO STEEL Sales, Bill Logan
 Lexmark International Inc., Johnny Sears
 LG Electronics Canada Inc., Raymond Platt
 Lund University, Chris van Rossem
 Manufacturing & Technology Centre, David Barnes
 Municipality of Hastings Highlands, Mark Freymond
 Municipality of North Grenville, Jeff McEwen
 Municipality of North Grenville, Jennifer Gorrell
 Municipality of Oliver Paipoonge, Jamie Cressman
 MaSeR Canada, Dana Wright
 Niagara Region, Carol Patterson
 Niagara Region, Brad Whitelaw
 Niagara Region, Catherine Habermehl
 Ottawa Valley Waste Recovery Centre, Sue Campbell
 Oxford County, Clayton Sampson
 Panasonic, Sean DeVries
 Pitney Bowes Canada, Doug MacDuff
 Product Care Association, Mark Kurschner
 Public Dialogue Alternatives, John Vincett
 PSAV, Stephan Jokisch

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PC Parametics, Robert Wilson
 Quinte Waste Solutions, Jeanne Vilneff
 RBRC, Shannon
 RBRC, Tyrone Biljan
 reBOOT Canada, Rich Roxborough
 Recycler, Jeremy Berger
 Recycler, Michael Spadotto
 Recycler, Barbara Cheifetz
 Recycling Council of Ontario, Jo-Anne St.Godard
 Rider Computer Services Ltd./Ecosys Canada Inc., Mary Pirrolas
 Region of Durham, Michelle Whitbread
 Region of Peel, Lindsay Milne
 Region of Waterloo, Jon Arsenault

Renewed Computer Technology, Shauna McCaffrey
 Renewed Computer Technology, Jacqueline Harvey
 Retail Council of Canada, Rachel Kagan
 Rogers Communications Inc., Geoff Francis
 Rogers Communications Inc., Deborah Evans
 Senior Policy Coordinator, Lisa Mychajluk
 Sharp Electronics of Canada, Eddie Colacchio
 Sims Recycling Solutions, Kelly McCaig
 Sierra Club Canada, Rod Muir
 Sony Canada, Nick Aubrey
 Stakeholder, David Sheridan
 Stakeholder, Norman Cheesman

STAPLES Business Depot, Ann Dennis
 Strategic Counsel LLC, Holly Evans
 Sussex Strategy Group, Chris Benedetti
 TELUS Communications Company, Wendy Luther
 The Regional Municipality of York, Leslie Gilbert
 The Wireless Source Canada, Gordon Weis
 Toronto Recycling Inc., Jason Lim
 Town of Kirkland Lake, Mike Aldred
 Town of Espanola, Joel
 Town of The Blue Mountains, Jeffery Fletcher
 Township of Algonquin Highlands, Gayle Short

Township of Armour, Leanne Crozier
 Township of Atikokan, Radu Apavaloae
 Township of Chatsworth, Grace Nayler
 Township of Hilliard, Joel Carleton
 Township of St Clair, Ron Kerr
 TROW Associates, John Smith
 Wal-Mart Canada Corp., Jennifer Barbazza
 Wal-Mart Canada Corp., Diane Gibson
 WDO, Glenda Gies
 West Nipissing, Jason Sullivan
 York Region-Waste Management Branch, Corena Cane
 York Region, Corena Cane

Comments on the Workshop/Webcast #2

Workshop/ Webcast #2

Comment Submission

National Association for Information Destruction (NAID), Duncan Rayner

Ontario Lottery and Gaming Corporation, Sam Fera

CAW Local 200 Computers For Kids, John McCloskey

Environmental Quescense (EQ), David Schlievert

Kodak Canada Inc., Rosemary Mandatori

Toronto Recycling Inc., Jason Lim

INFORMA Market Research Co. Ltd., H el ene St. Jacques

Town of Espanola, Canada, Bernie Gagnon

BMO Financial, Sarah Fortune

Workshop/Webcast #2 Participation

3m Canada, Mark Jacob

3M Canada Company, Vivian Cothros

ACI, Godwin Yan

ADL Process Inc., Mario D'Alfonso

Ageus Solutions Inc., Katalin Feszty

Ageus Solutions Inc., Brody Mitchell

AMETEK, Mark Scheuer

AMO-MIPC, Lisamaria Akeson

AMRC, Cynthia Hyland

AMRC, Vivian De Giovanni

Apple, Marek Jurkiewicz

Arlen Recycling, Alan Blumenthal

Artex Environmental, Victor Parish

Association of Municipal Recycling Co-ordinators, Vivian De Giovanni

ASUS Computer International, Goodwin Yan

Bell Distribution Inc., Tracy Petticrew

Beveridge & Diamond, Lauren Hopkins

Bluewater Recycling Association, Wendy Yamamoto-Chapman

BMO Financial Bank of Montreal, Sarah Fortune

Brendar Environmental Inc., Torin Macpherson

Bruce Area Solid Waste Recycling, Karrie Drury

City of London, Anne Boyd

Canada Post, James Briggs

Canadian Trend Perspectives, Henry Cieszynskic

Canadian Tire, Delphine Lagourgue

Canon Canada Inc., Greg Davis

Cardinal Meats Specialists, Glenn Vaughan

Carleton University, Paul Martin

CAW Local 200 Computers For Kids, John McCloskey

CCGD, Kim McKinnon

CFK Recycle, Rob McLean

Chatham-Kent, Rick Kucera

Cheesman & Associates, Norman Cheesman

Christie Digital Systems Canada, Inc., Tracy Zhou

CIELAP (Canadian Institute for Environmental Law and Policy), Carolyn Webb

Citi Cards Canada, Michael Elliott

City of Barrie, Tracy Quann-Strasser

City of Barrie, Chris O'Neill

City of Cornwall, Neil Dixon

City of Greater Sudbury, Denise Belanger

City of Greater Sudbury, Bernice Tario

City of Guelph, Bill Shields

City of Guelph Solid Waste Resources Division, Jennifer Molnar

City of Hamilton, Colleen Clark

City of Kingston, John Giles

City of London, Anne Boyd

City of North Bay, Al Tomek

City of Orillia, Greg Preston

City of Ottawa, Cameron Neale

City of Ottawa, George Reimer

City of Peterborough, Virginia Swinson

City of Sault Ste Marie, Randy Roy

City of Thunder Bay, Vanessa DeGiacomo

City of Toronto, Vibert Kevin

City of Toronto, Jodi Callan

CNW Group, Duane Bayley

CNW Group, Leon Wu

CNW Group, Bonnie Dean

Community Environment Alliance, Ranjana Mitra

Community Outreach, Valerie Alphonso

Computation Ltd., Dennis Maslo

Consumers Association of Canada, Mel Fruitman

Costco, Alda Nicmans

Costco, Lucia Rapone

Costco Wholesale Canada Ltd, Joelle Assaraf

County of Peterborough, Sherry Arcaro

County of Simcoe, Kimberley Pickett

County of Wellington, Das Soligo

CWTA, Kasia Majewski

dataXile Corporation, Josphe Bozic

Eastman Kodak, Michael Anseron

Ecojustice Canada, Elaine MacDonald

eCycle Solutions, David Betts

Electro Federation Canada, Larry Moore

Electro-Federation Canada, John Bailie

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

| | | | |
|--|--|---|--|
| Electronics Recycling Services, Sacha Murdock | Halton Region, Shirley McLean | Meno Ya Win Health Centre, Dave Hildebrand | Product Care, Mark Kurschner |
| Electro-Shred Ltd., Glen Rotterman | Hewlett-Packard Canada, Donna Chau | Ministry of Environment, Krys Potapczyk | PSVA, Marcel Potvin |
| ELSA, Ashley Deathe | Hewlett-Packard Canada, Vatché Otajian | Ministry of the Environment, Lisa Mychajluk | Quinte Waste Solutions, Jeanne Vilneff |
| Emerson Electric Canada Ltd., William Gombos | Hewlett-Packard Canada, Loni Tsui | Ministry of Transportation and Communication, David Barnes | Quixtar Canada Corp., Robin Bell |
| Energizer Canada, Shari Kirkconell | Hitachi Canada Ltd., Mike Marcogliese | Municipality of Hastings Highlands, Mark Freymond | RBRC, Tyrone Biljan |
| Environment Canada, Duncan Bury | Home Hardware Stores Limited, David Bois | Municipality of North Grenville, Jeff McEwen | RBRC, Shannon Hodge |
| Environment Canada, Mihaela Andronescu | Hewlett-Packard Canada, Heather Bowman | Municipality of North Grenville, Jennifer Gorrell | Reckitt Benckiser, Hal Ambuter |
| EPI International, Paulette Vinette | Hudson's Bay Company, Peter Skubna | Municipality of Oliver Paipoonge, Jamie Cressman | Recycling, Megan McGillicuddy |
| EPSC, Kailey McLachlan | HyTech Solutions, Dave Brunne | Municipality of South Bruce, Sharon Chambers | reBOOT Canada, Terry Murphy |
| EPSC, Dean Dussault | IBM Canada, Chris Paterson | Niagara Region, Catherine Habermebl | Recycling Council of Ontario, Jo- Anne St. Godard |
| Epson Canada Limited, Lynne Lyon | IIIEE, Lund University, Chris van Rossem | Niagara Region, Carol Patterson | RECYC-QUEBEC, Anne-Marie Doucet |
| EQ, David Schlievert | Industry Canada, Andre Barbeau | Niagara Region, Lydia Torbicki | Region of Durham, Michelle Whitbread |
| eTegrity Solutions, Joe Velacich | John Deere Ltd., Allan Hodges | Ogilvy Renault LLP, Richard King | Region of Durham, Lyndsay Waller |
| Ewaste Management, Don Leibold | JVC Canada Inc., Lesley Wang | One Change - Project Porchlight, Matt Surch | Region of Waterloo, Jon Arsenault |
| eWaste Recycling Inc., Barbara Cheifetz | KIMCO STEEL Sales, Bill Logan | Oneida Canada Limited, James Ives | Region of York, Nikki Vecchiola |
| eWaste Recycling Inc., Michael Spadotto | Kodak Canada Inc, Rosemary Mandatori | Ontario Lottery and Gaming Corp., Sam Fera | Regional Municipality of Niagara, Brad Whitelaw |
| Faxiom Electronix Inc., G. Ouellet | LaCloche Manitoulin Business Assistance Corporation, John Foster | Ottawa Valley Waste Recovery Centre, Elizabeth Graham | Renewed Computer Technology, Jacqueline Harvey |
| Geep Inc., Greg McWatt | Lenovo, Mary Jacques | Oxford County, Clayton Sampson | Renewed Computer Technology, Shauna McCaffrey |
| Geep Inc., George Craine | Lexmark International Inc., Johnny Sears | PC Paramedics, Robert Wilson | Renewed Computer Technology, Joe Wilson |
| GNR, Joe Grenier | LG Electronics Canada Inc., Raymond Platt | Philips Electronics Ltd., Michael Albani | Renewed Computer Technology, Gary Keefe |
| Government of Ontario, Katherine Olejarz | Loblaws Companies Ltd., Carolyn Muccilli Van Alstine | Private Sector, Mandy Pereira | Retail Council of Canada, Rachel Kagan |
| Gowlings, Catherine Beaudoin | Loblaws Companies Lrd., Suzanne Guillemette | Pitney Bowes Canada, Doug McDuff | Rider Computer Services Ltd./Ecosys Canada Inc., Mary Pirrolas |
| Greentec, Hugh Hinrichs | Mad Catz, Inc., Michael Guerrero | Pioneer Electronics of Canada, Betty Hutton | Rogers, Geoff Francis |
| Greystone Managed Investments, Travis Wetsch | Manufacturer, Janis Hodgins | | Royal & SunAlliance Insurance, Pam Davies |
| Haldimand County , Nicole Mundy | | | |
| Halton Region, Brenda McCrea | | | |

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

Samsung Camera, Stephanie Lee

Sanofi Pasteur, Melanee Short

Sanyo Canada Inc., Kerry Mendonca

Sharp Electronics of Canada, Eddie Colacchio

Smithsonian, Paul Smith

Spearhead Communications and Marketing Inc., Anne Boody Horwood

STAPLES Business Depot, Ann Dennis

Staples Business Depot, Gail Turner

Strong Township, Sundridge, Violet Montpetit

Sussex Strategy Group, Chris Benedetti

Telecom Computer, Jim Naysmith

TELUS Communications, Wendy Beaudoin

The Blue Mountains, Jeffery Fletcher

The Regional Municipality of York, Leslie Gilbert

The Shopping Channel, Andrew Penny

The Source by Circuit City, Eva Tai

The Wireless Source, Canada, Gordon Weis

Toronto Recycling Inc., Jason Lim

Town of Espanola, Anna Frattini

Town of Kirkland Lake, Mike Aldred

Township of Algonquin Highlands, Gayle Short

Township of Armour, Leanne Crozier

Township of Atikokan, Radu Apavaloae

Township of Hilliard, Joel Carleton

Township of St. Clair, Ron Kerr

Township of Stone Mills, Sharon Haaksman

Township of Strong, Diana Georgie

Trillium E-Scrap Recyclers Inc. Robert Langley

University of Toronto, Reno Strano

University of Waterloo, Joel Norris

Valu Shred, Rick Zeller

Volkswagen Canada, Julia Walczak

Wal-Mart Canada Corp, Diane Gibson

Waste Diversion Ontario, Glenda Gies

Waste Diversion Ontario, Clayton Sampson

WDO, Nicole Lewis

West Nipissing Environmental Services Ltd., Jason Sullivan

Willms & Shier Environmental Lawyers, John Willms

Xerox Canada Limited, Eunice Yeboah

York Region, Corena Cane

Comments on the Workshop/Webcast #3 and Draft Preliminary WEEE Program Plan posted on January 14, 2008

Workshop/ Webcast #3

Comment Submission

Accu-Shred Ltd., Scott Hurren
 ADL Process Inc., Mario D'Alfonso
 Association of Municipal Recycling Coordinators, Cynthia Hyland
 Asus Computer International, Goodwin Yan
 Cambium Environmental Inc., David Bucholtz
 CIELAP (Canadian Institute for Environmental Law and Policy), Carolyn Webb and Anne Mitchell
 Carestream Health Inc., Ellen Boettrich
 Christie Digital Systems Canada Inc., Tracy Zhou
 City of Guelph, Bill Shields
 City of Hamilton, Pat Parker
 City of Kingston, John Giles
 City of Orillia, Greg Preston
 City of Toronto, Kevin Vilbert
 CompuCorps Mentoring, William Marvel
 Computation Ltd., Dennis Maslo
 Computers for Kids, Carrie Schroeder
 KIMCO STEEL Sales, Bill Logan
 County of Wellington, Das Soligio
 dataXile, Joseph Bozic

Dominion Business Systems, Jim Sanderson
 Ecojustice, Elaine MacDonald
 Ecosys Canada Inc / Rider Computer Services, Bruce Hartley
 eCycle solutions, David Betts
 Environmental Quescense(EQ), David Schlievert
 eTegrity Solutions Company, John Velacich
 Ewaste Management, Don Leibold
 GEEP, George Crane
 FCM Recyclage Inc., Mitchell Rothstein
 GEEP Inc., Wallace Mackay
 Halton Region, Brenda McCrea,
 KIMCO Steel Inc, Bill Logan
 LaCloche Manitoulin Business Assistance Corp, John Foster
 MaSeR Canada Inc., Dana Wright
 Manufacturing & Technology Centre, David Barnes
 Motorola Canada, David Woody
 Motorola Canada, Carly Biggart
 Municipal Waste Integration Network, Maryanne Hill
 Niagara Region, Barry Frisen
 Quinte Waste Solutions, Jeanne Vilneff

Quinte Waste Solutions, Tanya Delany
 RDLong Computers Limited, Raymong, Long
 reBOOT Canada, Terry Murphy
 Recycler, Donald Douglas
 Recycling Council of Ontario, Jo-Anne St. Godard
 Region of Niagara, Catherine Habermebl
 Region of Peel, Lindsay Milne
 Region of Waterloo, Cari Howard
 Renewed Computer Technology, Shauna McCaffrey
 Foxy Recycling, Mike Hughes
 Sims Recycling Solutions, Cindy Coutts
 The Canadian Association of Recycling Industries, Leonard G. Shaw
 The Cement Association of Canada, Teresa Sarkesian
 The Salvation Army, Bill May
 Toronto Recycling Inc., Jason Lim
 Town of Whitby, Murray Gale
 Township of Hilliard, Janet Gore
 Trillium e-scrap Recyclers Inc., Robert Langley
 Waste Diversion Essex Windsor Solid Waste Authority, Cameron Wright

Whirlpool Canada, North America Region, Warrington Ellacott
 Wozco, Aaron Wozniac
 Incomplete Survey³
 KIMCO Steel, Bill Logan
 Apple Canada, Marek Jurkiewicz
 Kodak Canada, Rosemary Mandatori
 REIC Perth, Alfred Von Mirbach
 Toronto Recycling Inc., Jason Lim
 GEEP International, George Craine

Workshop/Webcast #3 Participation

Accountant/Vice President, Gerry Hughes
 Accu-Shred Limited, Scott Hurren
 ADL Process Inc., Adrian D'Alfonso
 ADL Process Inc., Mario D'Alfonso
 ARTEX Environmental Corporation, John Neville
 ARTEX Environmental Corporation, Paul Blanchard
 ARTEX Environmental Corporation, Vic Parish

³ Survey participants were contacted to ensure that a blank survey was not submitted in error. Pending results.

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

| | | | |
|---|--|---|---|
| Association of Municipal Recycling Coordinators, Cynthia Hyland | CIELAP (Canadian Institute for Environmental Law and Policy), Carolyn Webb | COSTCO WHOLSALE Canada, Lucia Rapone | Global Electric Electronic Processing International, Dave Douglas |
| Asus Computer International, Godwin Yan | City of Barrie, Tracy Quann-Strasser | County of Oxford, Pamela Antonio | Global Electric Electronic Processing International, George Craine |
| Bell Canada, Bettina Sales | City of Brockville, Valerie Harvey | County of Wellington, Das Soligo | Global Electric Electronic Processing International, Wallace MacKay |
| Bennett Jones LLP, Hilary Stedwill | City of Clarence-Rockland, Denis Longpre | CWTA, Kasia Majewski | Greentec, Hugh Hinrichs |
| BenQ Canada Corp., Joanna Wong | City of Guelph, Bill Shields | dataXile, Joseph Bozic | Halton Region, Brenda McCrea |
| Cambium Environmental Inc., Dave Bucholtz | City of Hamilton, Colleen Clark | District of Muskoka, Jamie Delaney | Hewlett-Packard Canada, Francis Edmonds |
| Cambium Environmental Inc., Christine Teixeira | City of Kenora, Richard Perchuk | DLNT Materials Management Group, Dennis Lloyd | Hewlett-Packard Canada, Stephen Berta |
| Canada Chinese Computer Association, Rose Lai | City of London, Wesley ABBOTT | Dominion Business Systems, Jim Sanderson | Hewlett-Packard Canada, Deanna Doyle |
| Canadian Tire, Leah Xing | City of London, Anne Boyd | E waste recycler, Glen Rotterman | Hilkene International Policy, Christopher Hilkene |
| Canadian Tire, Grant Caven | City of North Bay, Al Tomek | E Waste Management, Don Leibold | Hill & Knowlton, Mike Feenstra |
| Canadian Tire, Delphine Lagourgue | City of Ottawa, Marilyn Harrold | Ecojustice, Elaine MacDonald | Hitachi Canada Ltd., Paul DaSilva |
| Canon Canada Inc., Angela Wilson | City of Ottawa, S. McIntyre | Ecosys / Rider, Bruce Hartley | Hitachi Canada Ltd., Mike Marcogliese |
| Carestream Health Canada, Carolyn Viney | City of Peterborough, Melanie Kawalec | eCycle Solutions, David Betts | Home Hardware Stores Limited, David Bois |
| Carestream Health Inc., Ellen Boettrich | City of Sault Ste. Marie, Randall Roy | Electro Federation Canada, Larry Moore | HP, Melanie Hoots |
| CAW Local 200 Computers for Kids, Rob McLean | City of Thunder Bay, Vanessa DeGiacomo | Electro Federation Canada, John Baillie | HP, Donna Chau |
| CAW Local 200 Computers for Kids, Chris Davies | City of Toronto, Kevin Vibert | Electro-Shred, Stephen Bogler | Hudson's Bay Company, Peter Skubna |
| CAW CANADA, Ken Bondy | CNW Group, Kel Henson | Eprom Inc., Paul Ling | Independent, Bev Edwards |
| CEO/President, Peter Hughes | Community Outreach, Valerie Alphonso | EPSC, Jay Illingworth | JVC Canada Inc., Lesley Wang |
| Cheesman & Associates, Norm Cheesman | Competition Bureau, Maibang Khounvongsa | Epson Canada Ltd, Jim Innes | Kelleher Environmental, Maria Kelleher |
| CHHMA, Jim Papadopoulos | Computation Ltd., Dennis Maslo | EQ, David Schlievert | KIMCO STEEL Sales, Bill Logan |
| Christie Digital Systems Canada, Inc., Tracy Zhou | Computers for Kids, Chris Vilag | ESABC, Alda Nicmans | Kodak Canada Inc, Rosemary Mandatori |
| | Computers for Kids, Carrie Scorder | EWSWA, Cameron Wright | |
| | Corporate Policy Group, Jeff Newton | FCM Recycling Inc., Mitchell Rothstein | |
| | Corporate Policy Group LLP, Usman Valiante | Fujifilm, Yasmeen Khan | |
| | | GEEP Inc., Greg McWatt | |

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

LaCloche Manitoulin Business Assistance Corp, John Foster

Lenovo Canada, Ruchika Mathur

Lexmark International Inc., Johnny Sears

LG Electronics Inc. / EPSC, Raymond Platt

Mad Catz, Inc., Michael Guerrero

MaSeR Canada, Keith Blinn

Mattel Canada, Don Strain

Mida RPM, Randy Canacevic

Mida RPM, Micheal Love

Ministère de l'Environnement, Marie Dussault

Ministry of the Environment, John Armiento

Ministry of the Environment, Jennifer MacMillan

Ministry of the Environment, LSB, Larry Fox

Motorola Canada, Carly Biggart

Motorola Canada, Paul Frew

MTC, David Barnes

MTC, Troy Hanson

Municipality of West Nipissing, Jason Sullivan

Niagara Region, Sherri Tait

NuCove Development Corp., Senta King

Ontario Ministry of the Environment, Lisa Mychajluk

Pack Pros Plus Ltd., Patrick Fenlon

Panasonic Canada Inc., Sean De Vries

Philips Electronics, Mike Albani

Pitney Bowes Canada, Doug MacDuff

PSAV, Marcel Potvin

Quinte Waste Solutions, Jeanne Vilneff

Quinte Waste Solutions, Tanya Delaney

Quinte Waste Solutions, Jeanne Vilneff

Radio Systems, Debbi Logan

RBRC, Susan Antler

RCO, Jo-Anne St. Godard

RCT, Shauna MccCffrey

RDLONG Computers Limited, Raymond Long

reBOOT Canada, Terry Murphy

Recycler, Barbara Cheifitz

Recycler, Douglas Donald

Recycler, Lawrence Pazner

Recycling Canada, Mark Sabourin

Red Box Recycling, Chris Webb

Red Box Recycling, David Drutz

Region of Durham, Katherine Ross-Perron

Region of Niagara, Barry Friesen

Region of Peel, Lindsay Milne

Region of Waterloo, Cari Howard

REIC Perth, Alfred Von Mirbach

Retail Council of Canada, Rachel Kagan

Rider Computer Services - Ecosys Canada Inc., Mary Pirrolas

RIM, Mandy Dennison

Robert Bosch Inc., Jim Papadopoulos

Royal & Sun Alliance, Michelle Scott

RSC, Ryan Stephenson

Sears Canada, Jack Connell

Sears Canada, Karine Matthews

Sharp Electronics of Canada, Eddie Colacchio

Sims Recycling Solutions, Cindy Coutts

Sims Recycling Solutions, Kelly McCaig

Sony Canada, Nick Aubry

Stewardship Ontario, Diana Carr

Student, Carleton University, Paul Martin

Sussex Strategy Group, Chris Benedetti

Taknology Canada Inc., Raymond Au

Target Recycling Services Inc., Peter Barths

Target Recycling Services Inc., Paul Van Wyck

The Salvation Army National recycling Operations, Central and Southwestern Ontario, Bill May

The Source By Circuit City, Eva Tai-Lee

The Wireless Source, Canada,, Gordon Weis

Toronto Recycling inc., Jason Lim

Toshiba of Limited, Chantale Mantha

Town of Espanola, Anna Frattini

Town of Markham, Peter Veiga

Town of Whitby, Murray Gale

Township of Algonquin Highlands, Gayle Short

Township of Hilliard, Janet Gore

Township of North Frontenac, Jenny Duhamel

Trillium E-Scrap Recyclers Inc., Robert Langley

TTX Canada, Bruce Ault

University of Toronto, Julian Cleary

Vice President of Operations, Mike Hughes

ViewSonic, Melanie Foord

Walker Environmental Enterprises, John Walker

Waste Diversion Ontario, Glenda Gies

Wesbell, William Bateman

Whirlpool Canada, Warrington Ellacott

Wozco Inc., Aaron Wozniak

Xerox Canada Limited, Janet Townsend

Xerox Canada Limited, Eunice Yeboah

Comments on the revised version of the Draft Preliminary WEEE Program Plan posted on February 11, 2008

Comment Submission

ARTEX Environmental
Corporation, Ross Geiger
City of Hamilton, Pat Parker

District of Muskoka, Jamie
Delaney
eCycle Solution, David Betts
Ecosys Canada Inc/Rider

Computer Services, Bruce
Hartley
OERRA /Computation Ltd.,
Dennis Maslo

REIC Perth, Alfred Von Mirbach

Comments on the revised version of the Draft Final WEEE Program Plan posted on March 11, 2008

Comment Submission
CompuCorps Mentoring,
William Marvel

CWTA, Kasia Majewski, Paul
Frew,
eCycle Solutions, David,
Betts

MaSer Corporation on behalf
of OERRA, Dana Wright⁴,
iRecycle, Larurent Ho

Motorola Canada, Carly
Biggart

⁴ OERRA - Dennis Maslo, Computation, Dana Wright, MaSer Corporation, Len Shaw CARI, Mario D'Alfonso ADL Process Inc., Bill Logan, KIMCO Steel Sales Limited, Terry Murphy reBOOT Canada, Will Brown Computer Recyclers Inc, Joseph Boznic, dataXile Corporation, Patrick C Hebert Thriftopia, Laurent Ho, I-Recycle Computers, Robert W. Langley Trillum e-scrap Recyclers

Appendix I

Waste Electrical and Electronic Equipment

Issue-Specific Comments

| Comment / Frequency | | OES Response |
|--|---|--|
| Obligated Material Definitions (12) | | |
| 2 | WEEE definition misleading; Alternate descriptions including "Ontario Electronic Equipment Recovery, Reuse and Recycling Program is proposed. | Waste electrical and electronic equipment was designated under the Waste Diversion Act by Ontario Regulation 393/04. Under the regulation "waste electrical and electronic equipment" means a device that is waste, that required an electric current to operate and that is; a household appliance, whether used inside or outside a home, including any device listed in Schedule 1. Copies of the regulation and the Minister's Program Request letter are found in Appendix 3. |
| 1 | Are materials not specified by Phase 1 or 2 captured in the program? | The plan only addresses Phase 1 products. OES is to submit a plan for Phase 2 materials to the Minister within one year of approval of Phase 1 program plan. |
| 1 | Source of generation of Phase 1 WEEE materials. | All Phase 1 materials are obligated under the program |
| 2 | Clarification on components of Phase 1 material and whether collectors/reusers/ processors will be compensated for transporting/ processing Phase 1 components that have little recovery value. | All materials contained within Phase 1 WEEE that are not considered reusable by your organization are still considered WEEE and would be sent to an OES authorized downstream processor. |
| 1 | Would items purchased through lots sales (i.e. Crown Asset sales) be covered under this program? Many of the lots that we purchase contain unusable materials. | All materials that are Phase 1 would be obligated under the program. OES would like to understand further how "lot sales" and will follow-up with this organization. |
| 1 | No discussion on management of batteries or integration of the WEEE program battery generation with the scope and requirement of the (Phase 2) Municipal Hazardous or Special Waste Program Plan. | Batteries found within WEEE are managed by primary and downstream processors. There has been no discussion with Stewardship Ontario on this issue. |
| 1 | Gaming equipment designation under Phase 1 or 2. | Gaming equipment, whether for home use (e.g. gaming systems) or commercial uses (e.g. video lottery terminals, slot machines) are not covered under Phase 1 designated WEEE. In fact, it is not clear commercial gaming systems are covered at all in Regulation 393/04. |
| 1 | Printers with floor standing printers and optional floor stands excluded. Clarification required. | Phase 1 targets personal and business printers and not commercial printing equipment. Printers with optional floor stands are no longer excluded. See Table 2.1 in the plan. |

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

| Comment / Frequency | | OES Response |
|--|---|--|
| 1 | Would telecom equipment be considered Phase 1 or Phase 2 clarification required? | Telephones, modems and answering machines are designated as Phase 2 WEEE. Fax machines are the only telecom equipment covered under Phase 1. |
| 1 | Would UPS (Uninterrupted Power Supply) as well as main frame and storage units, hubs, routers and switches be considered Phase 1 materials? | Non Phase 1 materials. Please note modems are designated in Phase 2 of the Minister's letter. |
| Exemptions to Obligated Materials (1) | | |
| 1 | ICI&I products incorporated into larger devices or equipment should be exempt. | Please refer to Table 2.2. The exclusions list includes "non-standalone computers/monitors/televisions that are embedded into non-Phase 1 products. |
| Definitions Other (1) | | |
| 1 | We recommend that these definitions be redrafted to accurately reflect their actual reuse of refurbishing activities. | Noted. (no specific suggestions were included with the comment) |
| Program Costs (3) | | |
| 1 | Concern expressed with cost of legislation being a challenge to existing processors/collectors to remain in business. | The WEEE program plan is designed to increase accessibility to generators. The plan recognizes that meeting the standards may require some businesses to modify practices to meet the minimum standards required to become a certified collector or processor. |
| 1 | Is there an estimate gestation rate between the final submittal of the plan and actually allocation of funds? | No firm timelines are established. The plan, once approved by the WDO, if forwarded to the Minister. The Minister must post the plan on the Environmental Registry for 30 to 60 days for public comment. OES is assuming a 3 to 6 month approval process and a 6 to 8 month program implementation period prior to commencement. |
| 1 | Low volume Phase 1 products should be granted an allowance of alternative reporting frequency compared with high volume producers. This would contribute to a reduction in administrative fees. | Noted. Will enquire if other provinces have different reporting frequency for small volume producers. |
| Accountability/Transparency (2) | | |
| 1 | Draft program plan needs to outline the criteria/formula for OES's allocation of funds to the various stakeholders. | Noted. OES is proposing a revised process for allocating collected WEEE to approved processors. See section 5 |
| 1 | Third party audit need to ensure transparency. | The WDO will monitor the program performance on an annual basis. OES will retain third party environmental auditors for primary and downstream processor audits and verification. |

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

| Comment / Frequency | | OES Response |
|-------------------------------------|--|---|
| Miscellaneous (3) | | |
| 1 | Inappropriate use of picture of China and WEEE. The picture is a reflection of poor management of the WEEE facility not an environmental problem. | Noted. |
| 1 | Draft Plan does not address cottage country as well as Phase 1 and 2 materials that are imported from the USA. | The plan can only address EEE that is supplied for use in Ontario including that supplied by first importers in the province. |
| 1 | Recycling is a symptom not a cure. | Noted. |
| Promotion and Education (18) | | |
| 1 | Plan should clarify how education will be funded. | Section 5.6 outlines strategies and tactics that will be used to promote the objectives of the OES WEEE Program. It is funded through stewards' fees. |
| 1 | Plan should include a centralized mechanism such a web based program as an educational tool. | See Section 5.6. The strategic plan will include an initiative to develop an interactive, searchable website which will not only promote the proper management of WEEE but will provide a list of local collection points to ensure consumers can find convenient locations to drop off WEEE. |
| 1 | Any indication that P&E will be tracked and progress reported to the MOE? | OES will produce an Annual Report which will report progress to the WDO. |
| 1 | Plans need to set aggressive consumer outreach and education targets. | The WEEE Diversion Program Plan addresses the Minister's requirement that aggressive promotion and education take place to ensure outreach to Ontarians. The strategic plan includes qualitative and quantitative research which will establish the benchmark against which the success of the outreach and the program itself can be measured. |
| 1 | The Ontario government and WDO should take measures to ensure that the Program's educational activities are comprehensive and involve multiple perspectives. | The Promotion & Education (P&E) component of the plan includes a variety of proven media and social marketing activities that will achieve broad outreach to WEEE generators. |
| 1 | Is there a logo available that could be used in local advertising/promotional materials? | It is anticipated that the development of appropriate "branding" and perhaps a slogan will take place in the Pre-Commencement period. If that does occur, the logo might be made available to promote local events and activities. |
| 1 | Need for Public Opinion survey. | Qualitative and quantitative research is included in the strategic planning process. The first stage will establish benchmark research while subsequent years will track results against the benchmark. |

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

| Comment / Frequency | | OES Response |
|--|---|---|
| 2 | Need to promote reuse to ensure that a maximum of equipment is directed to a reuse and refurbish outlet or handling stream. | The website to be developed will promote reuse and provide a searchable tool for consumer and businesses generators of WEEE to locate reuse locations in their community. |
| 4 | Need for regional and municipal public education tools tailored and compatible with each region's/ municipality waste resource management program. | The P&E plan calls for both qualitative and quantitative research to be carried out to be sure communication messages and materials successfully communicate key messages and information. Modern technologies permit broad testing capabilities. As well, print ads and other promotional materials will be developed in consultation with municipalities to ensure compatibility. |
| 1 | Clarification that non Phase 1 WEEE should not be illegally disposed or landfilled. | Noted. |
| 1 | Attention and resources be devoted to point of sale consumer education. | The P&E plan includes a tactic to employ point of sale as a means of reaching WEEE generators. |
| 1 | Municipalities highly recommend that OES undertake telephone surveys, focus group research and other effective consultation tools to engage the public. This should be undertaken immediately following the approval of the plan and continue annually for the life of that plan. This research should guide the program in the development of better capture rates for WEEE. | The WEEE Program Plan P&E Section 5.6 details with how these research tools will be employed early in the Pre-Commencement stage, following approval and continue annually. Consumer research is a core component of the P&E strategy. |
| 1 | RCO represents a natural partner to support the program by broadening its communications. | Noted. |
| 1 | The Draft suggests that Promotion and Education are major requirements, while residents are waiting what to do with unwanted products and competitive costs. | The plan describes intentions to increase the number of collection events throughout Ontario to permit WEEE generators to access a collection event. |
| Rules and Governance (1) | | |
| 1 | OES needs to operate as a not-for-profit organization therefore it must ensure that no profit is accrued. | OES is a not for profit industry funding organization. |
| Recovery of Costs Associated with WEEE Program Plan (3) | | |
| 2 | Concern over stewards passing financial cost for legislation onto the consumers. Program scope needs to clearly define or prohibit this practice. | Noted. This is discussed in Section 7.6 of the revised draft WEEE Program Plan. |
| 1 | What is to stop an EOL processor from dropping the price below current market because they are the only one with in a reasonable transport distance? | As described in Section 5 of the revised Draft WEEE Program Plan, individual EOL processors decide what prices they will quote and therefore the prices that will be considered in the allocation of material. |

| Comment / Frequency | | OES Response |
|--------------------------|--|--|
| Harmonization (2) | | |
| 2 | Harmonization with other provinces is necessary from online reporting systems, product definition to over arching coordination. | OES has and will continue to look for opportunities to harmonize with the other provincial programs. |
| Fee Setting (29) | | |
| 1 | Allow for a mechanism to adjust fees to reflect true costs. The plan should incorporate a mechanism to prevent collection of fees from multiple sources on one unit of WEEE. Stewards should not be responsible for potential program cost increases due to inefficiency in administration of WEEE activities. | The program includes mechanisms to track WEEE collection from point of collection through to consolidation points to facilitate tracking of material flow and avoiding multiple payments for the same unit (for collection and processing) and so that the cost is minimized. The program will include a data reporting and tracking system for payment for collection and processing. |
| 1 | Difficult to gage if \$165/tonne will cover collection site costs without understanding what capital improvements are necessary to comply. A flat fee such as this penalizes small collection sites that might only receive 10 tonnes in a year. \$1,650 would not come close to covering the costs they incur to receive, sort and palletize WEEE and administer the program. | OES will discuss with the Municipal WEEE task group how a capital fund for municipalities could be administered. |
| 5 | \$165/tonne fall short of actual costs. Will not cover the additional costs of sorting, counting units, stacking and wrapping WEEE on pallets for municipalities. The proposed handling fee will be negotiated on an individual basis with potential collection agents. | OES has modified requirements to allow municipalities to use bulk bags and/or Gaylord boxes for all three streams. |
| 1 | \$165/tonne is sufficient for the reuse/refurbished to fund all the activities that reusers are involved in? | OES wants to allow a greater amount of materials to come through approved reuse operations, not just for reuse- but for greater EOL. The program will assist through driving higher volumes of WEEE to reuse organizations under the program. Table 7.9 summarizes the anticipated economic benefits to reuse/refurbishment organizations. OES has to treat all participants in a fair manner and therefore the collection incentive is the same for similar level of activity. If this proposed amount is not sufficient please indicate to OES a more adequate amount. |

| Comment / Frequency | | OES Response |
|---------------------|--|--|
| 1 | \$165 falls short as the value of products needs to take into account the cost of shipping the materials. Cases they would have no effect, however our current association with a downstream processor skids and Gaylord's are replaced. One could only hope that increases in volume, revenue from printers and the possibility of disposing of non revenue generating scrap would compensate for this. | Under the program OES assumes responsibility and costs of transportation from collection sites to consolidation and primary processing. OES will also provide pallets, bulk bags and shrink-wrap to collection sites. |
| 1 | Clarification needed on the proposed \$700/tonne bounty for each tonne of processed. | The updated WEEE Diversion Program Plan will provide detailed information addressing the assessment and review of the program model options. The OES program has favoured an integrated model for reasons that will be outlined and summarized in the new Section 4 of the Plan. The \$700/tonne bounty you refer to was from an earlier draft and was used as the assumed cost for processing for the purposes of budget planning and was based on data received from other provincial WEEE programs. Section 7.1.4 outlines the revised figures. |
| 1 | WEEE purchased outside of Ontario – Is it obligated? | Only EEE sold in Ontario is obligated. Collectors will need to document the source of WEEE delivered to collection points so that the cost of the program reflects the cost of managing WEEE from Ontario. |
| 1 | No open discussion of what the fees will be, based on models from other provinces which cannot be modeled as this province is different. | Noted. The revised WEEE Program Plan presents the data and assumptions on which the estimates have been developed – if better data are provided, these can be incorporated. |
| 1 | Will program fees be determined for the final draft? How will cost to consumer be incorporated as Stewards will not be able to absorb or have this price inclusive in price schedule methods due to the high cost? | Stewards are obligated to pay fees and draft fees will be posted in WEEE Program Plan. The prices charged to their customers are the business of individual stewards. |
| 1 | Page 37 of the Draft Plan states a \$165/ per tonne est. 40 cent cost per pallet. In addition it lists transportation /consolidation cost of \$12 per pallet and \$4.00 per tonne. This is misleading as this implies that a pallet is more expensive then a tonne. Does this mean that each pallet weights 3 tonnes? Clarification required on what \$165/tonne encompasses supplies or just pure costs. | The cost that you are referring to is a consolidation cost of \$12 per pallet - The cost has been clarified – the cost estimate is \$12/pallet and \$36/tonne, with an average weight of 0.3 tonnes per pallet. OES will provide key supplies (pallets, bulk bags/Gaylord boxes) |

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

| Comment / Frequency | | OES Response |
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| 1 | The plan needs to ensure a hierarchy or reduction and reuse before recycling. | Noted. |
| 1 | Fee scheduled should specify environmental handling fees of different components. | Fees are set for designated EEE products which are further defined in the Steward Rules presented in the revised WEEE Program Plan. |
| 1 | EOL processors are being paid a fee to process material. The value of the material should not be considered. They have the opportunity to generate revenue in addition to being paid in full for processing material. | Noted. The bidding process described in Section 5 of the revised WEEE Program Plan will ensure costs paid are minimized. |
| 1 | Section 4.8 Targets and Section 5 Fees: Financial or performance incentive system and/or fee adjustment framework be implemented for stewards and other stakeholders to help achieve high performance goals and targets. | Noted. |
| 1 | No clear methodology for determining accessibility targets. Table 4.4 proposes unclear five year accessibility targets. | Revised accessibility targets for Years 1 through 5 have been included in Section 5.8. |
| 1 | OES program should subsidize recycling programs where possible. | Noted. Payments for collectors and processors will cover recycling program costs. |
| 1 | Program costs should be internalized. Plan needs to provide further detail. | Noted. This is discussed in Section 7.6 of the revised WEEE Program Plan. |
| 1 | What is the assumption on the cost model/transparency relative to the consumer? Program costs should be externalized. | Noted. This is discussed in Section 7.6 of the revised WEEE Program Plan. |
| 1 | Processing fees should be set once plan is approved | Noted. Stewards' fees for Year 1 are approved with the plan and Rules. Fees paid to processors will be determined through the process described in Section 5.6 of revised WEEE Program Plan. |
| 1 | The total cost estimate is the addition of the slides to \$91M + yet to be determined program fees? | The total cost estimate is presented in tables in Section 7 of the revised WEEE Program Plan. |
| 1 | Section 4.8 Targets and Section 5 Fees – Plans needs to set 'high' diversion, collection, reuse and recycling targets to maximize environmental benefits. Financial or performance incentive system and/or fee adjustment framework be implemented for stewards and other stakeholders to help achieve high performance goals and targets. | Targets are provided in Section 5.8 of the Plan |
| 1 | Section 4.1.3 Handling Incentive – It is noted, for clarification that the proposed handling fee may or may not be sufficient or suitable for stage 2 or later stage products. | Noted. |

| Comment / Frequency | | OES Response |
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| 1 | Describe who gets to pay, who gets paid and where the IFO funding originates. | Stewards or Brand owners, first importers and assemblers of non-branded WEEE can discharge their legal obligations under the WDA through membership in and compliance with the rules of OES which has been designated as an IFO for WEEE by the regulation. Stewards' fees fund the program. All Phase 1 EEE stewards will be required to register with and pay fees to OES. |
| 1 | Further detail required about the strategy to handle phasing out of rear projection televisions. How does the plan reconcile this difference in the steward fees? | Noted. |
| Municipalities (30) | | |
| 1 | Will funds be made available for infrastructure improvement in areas, where municipal or non-municipal systems, are not adequate. | See Section 5.2.2 municipalities will be provided the same collection incentive and support for collection as other private sector, for profit and not for profit organizations which may include equipment but not building infrastructure. |
| 1 | The plan needs to ensure that E-waste generated in Northern Ontario should be collected and processed in Northern Ontario. | WEEE will be collected in all parts of Ontario. OES cannot control where a processor decides to set up operations. |
| 1 | Will a Municipality/Township be required to amend a landfill/transfer station Certificate of Approval to allow for the ongoing collection of WEEE material? | WEEE collection is exempt from MOE approvals provided it is simply collected and made ready for transport. |
| 2 | Would the plan allow opportunities for partnership between municipal collection and refurbishing/reuse organization so materials collected are screened for reuse before EOL? | The WEEE Program Plan places the choice of reuse or recycling onto the generator. If the municipality provides a reuse option it will have to track and monitor the reuse component and arrange its own partnership with an OES approved reuse/refurbishing organization. |
| 2 | What contingency plans has OES developed if municipal collection is halted due to inability to meet collector standards? Will OES step in and provide a comparable level of service? | Section 5.2 OES will be partnering with non-municipal outlets and providing mobile collection services. |
| 1 | Will municipalities that currently do not operate programs be identified to participate in the OES program? | Section 5.2 OES will look to partner with any municipality wishing to provide collection service in accordance with the plan. |
| 2 | In the absence of municipal collection OES should engage other collectors. Does the municipality have the right to charge for large deliveries? | Section 5.2: OES will engage a broad range of collection service providers Collection services will be provided in accordance with the plan and service fees may not be charged. However, large generators will be directed to collection sites that can manage the volume. |

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

| Comment / Frequency | | OES Response |
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| 1 | How will OES ensure that charities are not impacted? | Section 5.2: Not for profit organization are eligible to receive the collection incentive. |
| 3 | What are the next steps for a municipality becoming an OES approved collector? | Section 5.2: Once approved OES will begin to partner and train with collectors to ensure the collection standard is met. |
| 1 | Would municipalities providing collection be responsible for separating materials for destruction vs. for reuse? Will a guarantee of each service be necessary? | No, a municipal collection site does not have to provide reuse options. |
| 1 | Is it presently mandatory for municipal offices to accept old computers/electronic products from their ratepayers? | No. It will not be mandatory under the WEEE Diversion Program Plan. |
| 1 | Tonnage data split between ICI and residential sources needs to be reported to the WDO as part of data call in GAP. | Noted. The same information will be tracked and monitored under the WEEE Diversion Program Plan. |
| 1 | Could a municipality opt to contract out the sorting and palletizing process, and still be eligible to receive the \$165/tonne? The pick-up by OES contracted services would be done at the municipality's contracted service provider. | In principle yes. OES would like municipalities that are contemplating such arrangements to contact and work directly with OES to ensure full understanding of the arrangements before proceeding. |
| 1 | It is quite likely that a number of municipalities may opt to wait for a year or two before becoming involved with WEEE collection, until more is understood about the WEEE Program and its requirements. | Noted. |
| 2 | The program plan needs to clearly state that municipal involvement is voluntary. | Noted: The plan reflects the voluntary nature of all collection service providers. |
| 1 | The two phase approach to capturing the most common E-waste material will result in recyclable E-waste material that is brought to collection locations during phase one being rejected if the operators of the site follow the proposed program strictly. District of Muskoka will continue to run a program with both phases thus our funding will be based on a subset of the material collected. Thus a single phase approach is recommended. | The phased approach was at the direction of the Minister. OES is not authorized to provide collection and recycling services beyond that designated by the Minister as Phase 1 WEEE. |

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

| Comment / Frequency | | OES Response |
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| 1 | Monitors are clearly much less valuable than computers (e.g. current true price for EOL processors would likely be at least twice as high). I think, at least on an interim basis, there should be separate prices for the two streams so municipalities with limited budgets could opt to collect the higher value (less expensive to them) materials, at least until such time as a pay in/out structure is established to offset costs of real cost of dealing with monitors. This is similar to the early years of the BB. Collect the easy stuff first, then develop funding and incentives to deal with the harder materials. | OES is discouraging the “cherry picking” of WEEE as they have the obligation for all Phase 1 WEEE. Municipalities who opt to work with OES will not be responsible for all Phase 1 WEEE regardless of its value. |
| 1 | Municipal activities should not be treated as equals in the business of collection depots. NVD-Fees, are not an incentive to help the community guard its environmental sustainability. NVD-Fees prohibit civic responsibility from being individualized. | Not sure what is meant as a NVD-Fee. |
| 1 | Municipalities should receive information related to the success of any WEEE recycling activities. | OES will generate an annual public report on all WEEE recycling activities in Ontario. |
| 1 | The plan outlines a number of difficulties with the concept of Return to Retail. Municipalities share these same difficulties: including space limitations; need for renovations to accommodate returns; need to hire additional staff; specialized training to handle materials and packaging and movement of pallets and administrative costs. The plan does not address how these difficulties will be mitigated for municipalities. | The revised plan has made accommodations to municipalities who have the choice of using pallets or bulk bags/Gaylords for all collected Phase 1 materials. The \$165/tonne includes allocation for amortized capital if municipalities require handling equipment. |
| 1 | If municipalities are to be involved in the collection of WEEE at municipal depots, it is important that the end markets are credible and that municipalities receive information related to the success of any WEEE recycling activities. | OES is implementing an Electronic Recycling Standard that all processors must achieve before being eligible for receiving any collected WEEE. OES will be reporting on material flow from collection through to downstream processors and markets. |
| 1 | Municipalities should not be expected to cover the costs associated with the transition because of the phasing or for products not currently managed. | The phased approach was at the discretion of the Minister. OES is not authorized to provide collection and recycling services beyond that designated by the Minister as Phase 1 WEEE. |
| 1 | Municipalities should not be expected to cover the costs associated with pallet handling on site (i.e. pump truck/forklifts) and the cost to separated and store Phase 1 and 2 materials. | The revised plan has made accommodations to municipalities who have the choice of using pallets or bulk bags/Gaylords for all collected Phase 1 materials. The \$165/tonne includes allocation for amortized capital if municipalities require handling equipment. |

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

| Comment / Frequency | | OES Response |
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| 1 | Alternatively Ontario Electronic Stewardship could choose to operate private depots or events for residents to drop off WEEE. This may be acceptable from a cost point if industry assumed all of the funding for the depots or events. | The plan outlines special event collections in partnership with municipalities. |
| Stewards (12) | | |
| 1 | Will there be specific diversion guidelines that a bank will have to adhere to? | Generators of WEEE will need to determine their own security requirements prior to introducing material into the system. |
| 2 | OES will have unilateral control of the Ontario WEEE process as it will outline steward rules and penalties with non compliance. | OES will not have unilateral control. A generator needs to decide where to send WEEE. If it is outside the OES plan it will not be tracked and monitored or managed to the standards set by OES. |
| 1 | Will there be a per-component fee as in the SWEEP program? | OES will be providing fees for stewards and presenting stewards with a fee schedule. |
| 3 | Brand owner responsibility under the WEEE program. | Brand owners will have to register with OES only once the program has been approved. There are specific timelines defined for registration that will be defined in the Rules. Further detail will be provided in the final plan. |
| 2 | Notification of Stewards and program start timelines. | OES will have the responsibility of notifying potential stewards when the program is approved sometime in 2008. |
| 1 | Steward exemption over direct contract with generators (consumers) to take responsibility over disposal of steward branded products. | Not clear what the question or comment is. OES will follow-up directly this person. |
| 1 | Ontario residency a requirement of Steward? | The Rules can be found in Section 10. The Rules designate a steward is a Brand owners, first importers, and assemblers of non-branded EEE. Residency in Ontario is required, however, the Rules also allow non-resident steward to elect to be a steward. |
| 1 | 5.4.4 Items collected and managed by Stewards-Is there an option that makes it more desirable for a Steward to manage their own WEEE? | A steward could initiate an Industry Stewardship Plan (ISP) under the WDA. |
| Logistic/Transportation (32) | | |
| 8 | 4.1.2 OES Sorting and Packaging Requirements Palletizing WEEE materials not the preferred method for municipal collection as complicates collection and special event collection. Requirements for segregating, palletizing and shrink wrapping could be too onerous for many potential collection sites to take on. | Noted: OES plans to look at the use of reusable containers and/or Gaylords in the future. Research & Development funds will determine a more effective transport methodology. |

| Comment / Frequency | | OES Response |
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| 5 | Gaylords or other packaging methodologies. Consider including in the Draft Plan the ability to place TVs and monitors in a separate walk-in bin to minimize the risk of breakage. | Noted. Would like to see some examples of “walk-in” bin as OES plans to look at the use of reusable containers in the future. |
| 1 | We would like to see retailers play a significant role in collecting WEEE and we believe every retailer that sells electronics and electrical equipment should be required to act as a collector. We believe the ‘return to retail’ model offers the best choice for consumers and is most likely to result in the highest collection rate. | Noted: Section 5.2. Retailers may participate as a collection agent. |
| 1 | Handling incentives needs to be clearly defined if it is based on weight of WEEE in gaylords and skids. Will there be a weight requirement. | Noted: the collection incentive is based on the weight of WEEE collected exclusive of the pallet or container holding the WEEE. WEEE must be packed in accordance to the standard which does not have a weight requirement. |
| 1 | Will TVs’ in wooden consoles be accepted by the program? | Yes. |
| 1 | Will WEEE pick up/transport be covered by the program? | Yes from approved collectors. |
| 1 | Region of Peel recommends pick up/transportation services that would accommodate high volumes of collected WEEE on an on-going basis where storage space is minimal be supported. | Noted: high volume generators will be provided frequent pick-up based on a minimum pallet requirement. |
| 1 | Outdoor storage was not addressed; recommended that the plan acknowledge outdoor storage is acceptable. | Noted: Outdoor storage is acceptable for WEEE being recycled. |
| 3 | The proposed 50 special events annually fall short of current municipal collection days. This will need to be increased. | In Year 1 special events have been increased from 50 to 200. |
| 5 | OES is not anticipating the need for any physical changes to municipal collection sites; capital costs should be available to modify current collection sites. | Noted: Section 5.2.2 Municipalities will be provided the same collection incentive and support for collection activities as other private sector, for profit and not for profit organizations. The incentive includes an allocation for amortized capital that may be necessary for handling equipment but not building or property infrastructure. |
| 1 | 4.1.2 OES Sorting and Packaging Requirements Outside storage/exposure acceptable if not will require capital funding for municipalities. | Outdoor storage is acceptable. |
| 1 | End of life management declaration (re privacy protection on page 5) not detailed here. Site security requirements (per page 5) not detailed here. | Noted. |

| Comment / Frequency | | OES Response |
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| 2 | Transport logistics need to be clearly defined including frequency of OES collection, access to skids, shrink wrap other packaging materials, destination of excess shrink wrap materials, original manufacturing packaging such as boxboard and polystyrene, health and safety of staff who are collecting etc. | OES will provide frequent pick up of WEEE at collection sites with high volumes and can accommodate the minimum pick up amount. Refer to section 4.4. OES will establish collection standards and provide training for collection sites in order to stack and wrap to the collection standard with consideration to health and safety to all employees, collection sites, transport companies and processors. |
| 1 | Is OES projecting a false number of potential approved collection sites knowing that the approval of the plan will potentially cause existing processors to withdraw from the business? | No. |
| Collection/Processing (26) | | |
| 1 | Does proximity of processor to consolidation center add to positive outlook on the processor? | Section 5.6: The revised allocation approach assigned 10 out of a total of 100 points related to the distance and cost that OES has to pay to deliver WEEE to approved processors. |
| 1 | Ontario Electronic Stewardship could choose to operate private depots or events for residents to drop off WEEE. | Section 5.2: OES will partner or provide collection through a number of avenues. |
| 4 | Generators and choice in disposal vs. reuse. | Generators have the final say in what happens to their waste. |
| 1 | The benchmark requires that volumes from IC&I sources are reported separate from residential sources. | Noted: the WEEE plan will require tracking and monitoring of IC&I sources. |
| 1 | No provision has been made for the costs of Transportation from IC&I clients to collection centers. | All generators are responsible to deliver WEEE to a collection site. |
| 3 | Dual roles of processors and collectors. | Collection and processing may be offered at the same location provided appropriate tracking and monitoring is in place. |
| 1 | Will OES fund for materials that do not provide any value and have to be transported to an EOL processor such as plastic scrap? | OES will cover the cost of non-revenue generating WEEE to EOL from approved reuse/refurbishing operations. |
| 2 | Will OES influence other operations outside of the Phase 1 EOL process; for example extraction of precious metals? We can manage our non Phase 1 materials as we do now? | OES has no influence or authority over non-Phase 1 WEEE. |
| 2 | With regards to the resident / consumer as the “final user”, should they be expected to understand the value of such end product(s) to enable them to make the decision as to final direction? | Noted. |

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

| Comment / Frequency | | OES Response |
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| 1 | OES should consider how other approaches to waste diversion could be used to prioritize and maximize, where feasible, better design, followed by waste reduction, reuse, then recycling. | Please review Section 5.8.2. |
| 2 | Plan allows reuse organizations to continue to remove revenue generating scrap for sale to approved OES downstream processors and retain revenue. The economic structure of most recyclers is to provide a per pound fee for the processing of WEEE. This per pound fee incorporates the costs of processing the WEEE in an environmentally sound manner and takes into account that some revenue will be generated by the commodities with a positive value. If these commodities are removed, or “cherry-picked”, the recyclers will charge a higher fee for this “waste” material. If this “cherry picking” is allowed under the program, which we strongly oppose, a separate higher recycling fee category will need to be established for the recycling of this higher cost material. | OES understands that someone else i.e. first processor might have gained additional value from the WEEE- whereas taking away the added value from a downstream processor. We will take your views on this. The board will need to make the choice how to approach this matter. The point of the WDA is to change behavior in the market. OES needs to ask what is it that it is trying to achieve. IF OES promotes re-users, or processors? We encourage you to submit a comment in writing. |
| 1 | Primary and downstream processors are in direct competition; downstream processors should not be disclosed as this is confidential information. | Primary processors wanting to receive WEEE from the OES program plan must be in compliance with the Electronic Recycling Standard which requires information on downstream processors. All information is confidential. |
| 1 | OES approved reuse/collecting sites need to be publicized. | Noted: All approved collection and reuse sites will be promoted. |
| 1 | The plan needs to provide a hierarchy of plastic management. | OES recognizes the gap between what the recycling accomplishment will be and what will be the difference between metals and plastics. OES realizes there are challenges with plastics. This is an important issue that extends to other provinces and their WEEE programs. OES has committed R&D funding to researching plastics from WEEE program. |
| 1 | As a reuse/refurbisher we would be putting electronic items back into the market place although this is not the original manufacture nor are we the first importer; would we be consider a steward of the programs and subject to steward fees? | No. |

| Comment / Frequency | | OES Response |
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| 1 | Section 4.4 of the Plan Step 6 should indicate that successful bidders will not be given any guarantee of waste quantities to be received, but successful bidders will be given an estimate, or range, of the amount of product, by weight, they might expect to receive. | Noted: Section 4.4 has been changed and is part of Section 5. Further, the allocation of WEEE has been modified to provide WEEE to approved processors based on a revised bid process. The quantities bidders can receive are presented in Section 5.6. |
| 1 | Section 4.2.3 should include a statement that waste material collected by a recycler would most likely be processed by that recycler and not be forwarded to a consolidation point. | Noted: processing and collection will be allowed to take place at the same location provided adequate tracking and monitoring. |
| 1 | How many locations has OES visited to ascertain the viability of this avenue for approved collection sites? Is OES projecting a false number of potential approved collection sites knowing that the approval of the plan will potentially cause existing processors to withdraw from the business? | OES could not commit to visiting every processor in Ontario, but did informally visited 15 processors/reuse/refurbishment organizations in Ontario and one in Alberta. |
| Research and Development (11) | | |
| 2 | Section 4.7 Research and Development – Areas for R&D include; Determination of ‘actual service life’ of products by both residential and by commercial/corporate and Determination of the actual ‘fate’ of products after first use. | OES has earmarked funds for composition and life span research of collected WEEE and to conduct a reuse study of collected WEEE to determine functional and economic reusability to assist in establishing reuse targets for future years. |
| 1 | OES and the Ontario Government should work with the WEEE management sector to promote the research and development of improved plastics recycling capabilities. | OES has earmarked R&D funds for research into plastic market from WEEE. |
| 8 | The plan needs to incorporate incentives to promote reduction and design for environment (Design for Environment) although we acknowledge that promoting these activities is a significant challenge. | Noted. |
| Program Plan (37) | | |
| 4 | The plan should be structured and delivered in a manner that can maximize recovery for (potential) reuse, reduction and repair. All parties should maximize the “reusability” of materials first prior to end of life. | Reuse will be promoted as an integral part of the promotion and education. OES has developed a reuse and refurbishing standard in association with this industry in Ontario which is believed to be the first of its kind in Canada and North America. |
| 1 | Section 4.1 Core Elements of the Program (and subsections) Consideration of all core elements of the plan requires the opportunity to encourage and maximize product reuse. The program should provide the tools and capabilities for products to be identified as (potentially) reusable. | Noted. Would like the questioner to provide some examples of tools to determine reusability. |

| Comment / Frequency | | OES Response |
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| 1 | Reuse and refurbish service providers should be allowed the opportunity to inspect assess and 'extract' products from the recovery streams at suitable locations as early in the recovery process as possible. Section 4.1 Core Elements of the Program (and subsections) – Consideration of all core elements of the plan requires the opportunity to encourage and maximize product reuse. The program should provide the tools and capabilities for products to be identified as (potentially) reusable at every step and for these products to be segregated from the true 'end-of-life' materials that are expected to be recycled. Reuse and refurbish service providers should be allowed the opportunity to inspect, assess and 'extract' products from the recovery streams at suitable locations as early in the recovery process as possible. Reuse and refurbish service providers should be required to assist in the early identification of potentially reusable products by providing data, information and procedures for 'generators', collectors, consolidators and recyclers. Descriptions, images, models and similar information should be made available on OES's and other program websites and in promotional materials to assist end users to identify their products as potentially reusable. Identification by the end user/generator will be of great assistance in segregating product at collection locations. | OES approved reuse and refurbishment organizations will be allowed to assess incoming WEEE to assess reusability. OES will also be providing information about reuse on the searchable website for consumers and businesses with guidelines to educate generators on issues and questions about data privacy and reusability. |
| 1 | Reuse and refurbish service providers should be required to assist in the early identification of potentially reusable products by providing data, information and procedures for 'generators', collectors, consolidators and recyclers. | OES would like further information about what the respondent is proposing. |
| 1 | Option three as preferred market option- clarification needed on why this approach was taken while the collector and processor bounty approaches were rejected. | Explanation provided in Section 4. |
| 1 | Modeling Ontario program on other provincial programs is not sufficient. | The program has been designed to meet the requirements of the WDA and the Program Request Letter. |
| 1 | Will OES pursue launching a program to include all Phase One / Two items together? | To be determined how Phase 2 will be integrated into the Phase 1 program. |

| Comment / Frequency | | OES Response |
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| 1 | The Waste Diversion Act stipulates that programs developed by WDO should “seek to ensure that waste diversion programs developed under this Act affect Ontario’s marketplace in a fair manner.” The draft plan enables OES to control the flow of the products and materials that are to be recovered. This will effectively eliminate commercial competition within the collection and recovery market. | Please review revised allocation approach in Section 5.6. |
| 1 | Draft Program the OES program does not offer a competitive market. There will be no incentive for any one producer to internalize the fees since every product category for each OES producer will bear exactly the same fees under the OES WEEE program. With program costs “externalized” directly to consumers OES members will bear no financial costs nor any competitive “marketplace effects”. | OES will assess fees to stewards. |
| 2 | The plan should be structured and delivered in a manner that can maximize recovery for (potential) reuse. All parties should maximize the “reusability” of materials first prior to end of life. | Noted. |
| 4 | A provincial ban on the landfilling of WEEE products should be taken into consideration. | OES does not have the ability or authority to ban materials from disposal. |
| 1 | However, before proceeding further, it is strongly recommended that OES apprise the political leadership that there is an outstanding opportunity for regional economic development especially in those towns/regions that are dependent upon single industries. | Noted. |

| Comment / Frequency | | OES Response |
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| 1 | <p>OES, to meet its obligations to deliver an effective WEEE program, all it must do is ensure that: All WEEE collectors wishing to participate in the OES program are registered with OES. Only registered WEEE collectors are eligible for “monetary collection incentives” but solely contingent on whether they ship collected WEEE to reuse/refurbishing operations, intermediary processors or end-of-life materials recovery facilities that are also approved and accredited by OES. In turn, reuse/refurbishing operations, intermediary processors or end-of-life materials recovery facilities must be able to verify to OES the quantities and types of materials received from registered collectors and the mass balance of material either sold for reuse, refurbished and then sold for reuse or processed for recycling and then shipped to “end-of-life” resource recovery operations. The only payment of monetary incentives are to collectors for the recovery of WEEE for processing – normal market negotiations and the exchanges of materials and money between various economic players in the WEEE market would unfold just as they do today. This will promote competition in the WEEE market (thus lowering system costs) and avoids the creation of a buying monopoly. The collector model will provide incentives for collection and promotes reuse and recycling. This model will not disrupt existing working WEEE markets.</p> | <p>See summary of options outlined in Section 4.</p> |

| Comment / Frequency | | OES Response |
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| 1 | Figure 4.1 outlines that OES contracted or controlled consolidation points and is a monopoly. The establishment of a such a buying monopoly will effectively allow one set of economic interests – large multinational original electronic equipment manufacturers (OEMs) and “big box” retailers who themselves may be electronic equipment brand owners – to effectively control the WEEE processing industry and potentially sideline (and thus eliminate) many existing and fully qualified WEEE processing businesses. This is entirely unnecessary for the purposes of meeting the environmental objectives set forth by the WDA and the Minister. This situation is entirely contrary to S. 5 (c) of the Waste Diversion Act (“WDA”) which states that program developed by WDO should, “seek to ensure that waste diversion programs developed under this Act affect Ontario’s marketplace in a fair manner”. | Please review revised allocation approach in Section 5.6. |
| 1 | Figure 4.1 on Page 40 (Draft Preliminary Plan) OES and vendor qualifications elements of which are more patent barriers to entry than reasonable environmental standards. | The proposed Electronic Recycling Standard (ERS) is reasonable as largely addresses the processor operating in a legal manner and in their ability to track information with their downstream customers. The ERS is the same standard currently in use in three provinces. |
| 1 | Any materials derived from WEEE that are not reused or recycled are outside the program, even if it is as a result of WEEE processing, and should not be reported as material that has been recycled or reused under the program. This will require careful auditing and accounting by collectors and recyclers/ processors. | Comment noted. The program has a requirement to track WEEE from the point of collection through to EOL management. |
| 3 | Based on the Phase 1, Public and Private Organizations will be faced with having to find other processes to deal with end of life products not covered by Phase 1. | OES will only be granted the authority to manage Phase 1 WEEE. |
| 1 | Program and subsequent indication that the costs will be transferred to consumers is based on guesswork. | Best available information is used to develop program targets and costs. |

| Comment / Frequency | | OES Response |
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| 1 | <p>Elimination of the RFP process focuses on a certification program for both transporters and end-markets. Potential service providers would then apply to OES to participate in the Program. OES would review applications and certify only those that qualify based on a set of operating standards as described in the Plan. All certified service providers could be listed on OES’s website. Collectors would be required to use services from only certified transporters and end-markets. Collectors would be paid directly from OES on a per tonne basis but would open to choose their preferred “hauler” and end-market from the OES certified list. WEEE materials would be picked up at no charge from the collector. Collectors would make arrangements with a transporter and would report shipped tonnes to OES at which point they would receive their handling incentive for collection. The transporter would also be paid on a per tonne rate for pick-up. Transporters would then be open to take materials to any of the OES certified end-markets but would also be responsible for tracking and reporting final destination of materials to OES. Certified end markets would be allowed to negotiate price with transporters and collectors. Once they receive materials they also report amounts to OES. OES reconciles all reports to verify flow of materials. For additional assurance, OES could hold back “performance payments” that would be released if and when reports are reconciled and materials are accounted for. OES may also consider a ‘zero tolerance’ policy, whereby any ‘infraction’ to the system results de-certification of the service provider for a period of time, (i.e. the service provider would be removed from the preferred service provider lists).</p> <p>It is conceivable that with this model, reuse and refurbishing facilities would be at an advantage as they would receive materials from the transporters free of charge, a competitive advantage from the processors who would charge a fee. Reusers and refurbishers would also be provided with free pick up services for their discarded materials. Applying this model may also require an analysis for the need for larger centralized consolidation depots if palletizing the material is considered critical centres.</p> | <p>Section 4 assesses some options OES reviewed.</p> |

| Comment / Frequency | | OES Response |
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| 1 | <p>OES's evaluation of the Collector Bounty (CB) and Processor Bounty (PB) program is extremely superficial and subjective and only highlights that its preferred option is in its economic interests rather than in the interests of creating more recovery options and increasing waste diversion. The OES preferred model fails to meet the requirements of the Ministry of Environment's clarification letter of August 13th, 2007.</p> <ul style="list-style-type: none"> ● Ignores the stipulation "existing legitimate diversion activities must be taken into account ". OES continues to propose a monopolistic flow control" model (with a new convoluted OES processor tendering scheme to provide a price control scheme with a façade of "competition") that will achieve nothing except disruption to the existing collection and processing market; ● Reuse activities are undermined because administrative/compliance requirements for reusers are costly with no real measures to increase volumes of materials. ● OEM/steward information technology (IT) take-back programs are ineligible for incentives thus acting as a strong disincentive to electronic products manufacturer take-back and EPR. In fact it should be expected that all of the electronic products manufacturer activities cited by OES in Section 3.3 will be phased out over what will largely become a municipal WEEE collection system. | <p>OES disagrees with this assessment that the plan fails to meet the requirements of the Minister's Program Request Letter and the WDA.</p> <p>As to the first bullet, OES is relying strongly on the existing legitimate diversion organizations.</p> <p>Volumes of reusable material should increase through the province wide promotion and education campaign as there will be a focus on educating generators about reuse of unwanted equipment.</p> <p>In regards to the third bullet, OES has modified its program and does allow OEM/steward take-back to be eligible for the collection incentive as outlined in Table 5.1.</p> |
| 1 | <p>OERRA remains very concerned about the superficial and largely cosmetic changes made to the February 4th 2008 draft of the Preliminary WEEE Program Plan. OES (and WDO) need to take a more objective approach to the evaluation of the Collector Bounty and Processor Bounty models with a view to implementing a program that harnesses the energies of the market to maximize WEEE recovery, reuse and recycling in Ontario.</p> | <p>Noted.</p> |

| Comment / Frequency | | OES Response |
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| 1 | <p>Table 4.1 page 44 refers to a summary of Ontario WEEE Program models with regard to Minister’s request Letter Requirements. OERRA provides the following comment regarding section 5e) Promotion and Education.</p> <p>All of the P&E strategies identified in Section 5.6 of the WEEE Plan can be implemented irrespective of the model chosen. Under a bounty model any collection site registered to collect the OES bounty could be referenced in OES communication vehicles – the IM model is not necessary to achieve this.</p> | Noted. |
| 1 | <p>Table 4.1 page 44 references section 6g) of the Minister’s Letter.</p> <p>Financial incentives to eligible collectors will percolate through the market from collector to processor increasing economic activity throughout the market. This approach will be MORE effective than the OES monopoly contracting model because it will harness not quash the market. The proposed collection and processing incentives in the OES IM model have no more “incentivizing” effect than a collector or processor bounty model. OES has provided no evidence to support its subjective statements. OES’s preferred program design limits the number of eligible private sector market players in order to reduce its administrative costs. A strong infusion of financial incentives into the existing market will make it less costly for WEEE generators to dispose of their WEEE, more attractive for collectors to collect it and more lucrative for reusers, refurbishers and recyclers to process it. Again, no evidence is provided to prove that OES’s preferred IM model is any more effective at “incentivizing” reduction, reuse and recycling.</p> | Noted. |

| Comment / Frequency | | OES Response |
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| 1 | Table 4.1 (page 44 reference to section 7) of the Minister's Letter. To be eligible to participate in the WEEE program every collector and processor will have to ascribe to standards whether under a "bounty" model" or OES's preferred integrated model. There is no difference. Contracts are not necessary to ensure compliance. Virtually all other stewardship programs across Canada that utilize private sector collectors and processors do not require contracts - only accreditation, registration and tracking reporting. | Noted. |
| 1 | Table 4.1 page 44 reference to sections 8) and 9j) of the Minister's Letter. If all eligible collectors and processors are registered with OES and must report collection and processing quantities how is there any more opportunity for fraud than under the OES preferred model? Again implementing a program tracking and audit protocol is not contingent on contracting. | Noted. |
| 1 | Table 4.1 (page 44 reference to section 9i) of the Minister's Letter. This is a purposeful misinterpretation of the Minister's PRL. If the program only pays a collection incentive and no processing incentive (or vice versa) one number is a positive dollar amount and the other is zero - this is a requirement for program financial transparency and nothing else. To suggest that the Minister has proposed that OES must establish price controls throughout the market is ludicrous. All models including the Collector Bounty, Processor Bounty and Integrated Model can meet with the requirement for transparency of fees. | Noted. |
| 1 | Table 4.1 (page 44 reference to section 11) of the Minister's Letter. OES' statement is a non sequitur: If a collection bounty is being paid by OES on the quantity of WEEE collected and processed everyone has an incentive to recover and recycle more as well as compete on price; the OES program will constrict collection and processing capacity through artificial pricing, restraint on market participants and flow control of materials. It will likely reduce current recovery, reuse and recycling rates for WEEE. | Noted. |

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

| Comment / Frequency | | OES Response |
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| 1 | Table 4.1 (page 44 reference to section 12) and 9d) If collectors are provided with geographically stratified financial incentives (i.e. zone based fees) they will travel to all parts of Ontario to recover WEEE. This is exactly the approach taken by Stewardship Ontario with regard to geographic stratification of zones for the purposes of collecting MHSW from IC&I generators under the recently approved MHSW plan. A zone based collection fee system meets PRL requirements. Even under its preferred approach OES admits that it will have to, "...establish transportation zones that dovetail with the locations of the future consolidation centers and primary processors." | Noted. |
| REOI Process (2) | | |
| 1 | Data about current processing capacity does not reflect true processing capacity in the province. | Comment noted. No further information was provided to refute what has been included in each draft of the plan. |
| 1 | Support the approx. 170,000 tonne of WEEE processed today. | The 170,000 tonnes was stated capacity and not tonnes processed today. Information provided from the REOI process is a confidential process with the numbers being combined to maintain privacy. |
| Regulation 393/4 (4) | | |
| 2 | Other materials in Regulation 393/04 not captured in the program - mandate needs to expand. | OES is not authorized to provide collection and recycling services beyond that designated by the Minister as Phase 1 WEEE. |
| 1 | Need for marketplace analysis. | Noted. |
| 1 | Phase 1 and Phase 2 materials should be dealt with together. | OES is not authorized to provide collection and recycling services beyond that designated by the Minister as Phase 1 WEEE. |
| OES Board/Consultation (8) | | |
| 5 | Board composition not representative of processors. | Noted. IFO's in Ontario to date have board governance models that are comprised of obligated stewards. Including potential service providers on governance boards would raise issues about conflict of interests. |
| 1 | Board does not have expertise to design a WEEE plan. | The OES board is comprised of representatives who are involved in provincial WEEE programs in Alberta, Saskatchewan, B.C and Nova Scotia. |

| Comment / Frequency | | OES Response |
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| 1 | This program covers only the “grave”. Stewards and the OES board members do not have the expertise or knowledge of end-of-life collection or recycling, yet they are developing the collection program. | The OES board is comprised of representatives who are involved in provincial WEEE programs in Alberta, Saskatchewan, B.C and Nova Scotia. |
| 1 | How are recyclers assured the objectivity of the OES Board in the assessment process? Each board member contracts its own current recycler. What prevents them from favouring these recyclers versus being objective in the application of the Assessment Criteria? Will the assessment be made public? | A revised WEEE allocation assessment has been presented in Section 5.6. |
| IC&I (14) | | |
| 1 | Section 4.2.4 Direct IC&I Generators - The plan should be more prescriptive in encouraging the reuse of equipment from these sources. | Noted. |
| 1 | IC&I needs are not addressed including on site pick up, certificate of destruction guarantees, a mix of phase 1 and 2 or other electronic material, bulk collection, national requirements, landfill site limitations. | Noted. Section 5.2 – all generators are encouraged to deliver WEEE to approved collection sites. |
| 1 | Existing relationships between IC&I and EOL processors where a consolidation center is not the “closest”. | Collection and Processing may take place on the same site provided appropriate tracking and monitoring systems are in place. |
| 1 | Section 4.2.4 Direct IC&I Generators - The plan should be more prescriptive in encouraging IC&I to reuse. | Noted. |
| 1 | 2.3 Direct IC&I Generators (pg 45). Will existing business relationships between, generators and processors be allowed if all standards are met but the consolidation center falls beyond the OES recommended location? | Existing business relationships are not affected and service providers are encouraged to continue diverting WEEE in accordance with the OES plan. |
| 1 | The tonnage data for WEEE collected across Ontario should be split between ICI and residential sources with the residential tonnage reported to the WDO for reallocation to municipalities as part of the annual data call in the GAP analysis to help determine the amount of residential waste being diverted from landfill. This is consistent with the glass tonnage that residents return to Brewers Retail outlets being reallocated back in the GAP analysis. If the tonnage is not reallocated then the tonnage being diverted is lost. | IC&I and residential WEEE will be tracked and monitored separately. |
| 8 | OES should be seeking to triple the IC&I recovery, reuse and recycling. | Noted. |

| Comment / Frequency | | OES Response |
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| RFP Process (18) | | |
| 1 | The assessment criteria slide 75 (OES workshop #3) there was a weighting factor of 35 assessed to environmental standard. Could you please tell me the weighting factor between the environment and the final price meaning that if a company is being able to come in with a diversion of 95% of diversion but there costs are higher i.e. 45 cents versus someone who comes in at 75% and their costs are 30 cents. How will you determine which is a better processor? | Section 5.6: allocation of WEEE has been revised to reflect new weight factors for approved processors bidding on WEEE. |
| 1 | Need for a shortlist of RFP candidates. | Section 5.6: a revised allocation process has been drafted. |
| 3 | Will the plan allow for out of province RFP candidates? | OES does not restrict any processor from being approved or competing for WEEE. |
| 1 | Is the RFP process applicable to downstream processors? | All downstream processors must be approved by OES. |
| 1 | Clarification of Table 4.1 Draft WEEE Processing RFP Assessment Criteria Factors that deals with how applicants are graded in the individual components 0-35. | Noted. See Section 5.6 for a revised explanation and allocation process. |
| 1 | Operational timeline for RFP completion is necessary. | See Sections 5.5 and 5.6 for revisions to the process for approving processors and for allocating collected WEEE to approved processors. |
| 1 | RFP criteria needs to include economic impact for Ontario weighted at 25 or higher? | See Sections 5.5 and 5.6 for revisions to the process for approving processors and for allocating collected WEEE to approved processors. |
| 1 | How will OES weigh “diversion potential” to “price”? For instance if company A claims ability to divert 75% at a cost of \$ 0.31 lb, but company B claims ability to divert 93% at a cost of \$ 0.43 lb, how will OES determine where to send. Historically, costs to achieve those incremental levels of diversion, may prove more costly due to extra capital & operating costs to address. | Noted. See Section 5.6 for a revised explanation and allocation process. |
| 1 | Plans need to contain additional information regarding the qualification and authorization/approval of the Collectors, Consolidators, and Transportation subcontractors; Insurance policies ; Data Tracking ; Certifications; Performance standards; System Requirements; Reporting Requirements; Warehouse Requirements; Transportation Fleet Requirements. | Noted. |

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| Comment / Frequency | | OES Response |
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| 1 | RFP assessment should include weighting for reuse and a percentage for refurbishment. | Noted. |
| 1 | Strongly recommended that another criterion be added: Economic impact for Ontario. It should be weighted very highly (i.e. 25 or higher). Since Ontario citizens are funding this entire process, Ontarians and their businesses should benefit. | Noted. |
| 1 | To maximize reuse, all reusers should be supported by the program as long as they meet the minimum environmental standards established by the program. | Noted. |
| 1 | OES should consider a process where an initial short list is created of potential recyclers based on such factors as experience and financial capability. Only this short list would then move on to the vendor assessment. | Noted. Refer to Sections 5.5 and 5.6 for revised descriptions of the process OES is planning. The only approved processors that meet the Electronic Recycling Standard will be eligible to bid for WEEE collected through the program. |
| 1 | Ecojustice recommends that instead of using a RFP process to select reusers, that all reusers that meet or plan to meet the 'environmental standards' set up by OES be approved WEEE reusers under the program. | Noted. Reuse organizations meeting the OES standard will be promoted and included in the plan under agreement with OES. |
| 1 | RCO recommends that OES consider eliminating the RFP process for processing, and control materials through a certification program with a main focus on tracking and reporting. | Noted. See Section 5.6 for revised allocation process. |
| 1 | OES should also require random brand reporting to assess the amount of "orphaned" materials that are found in the system. Therefore RCO suggests higher rating for tracking, monitoring and reporting within the certification process. | Noted. |
| Collection Accessibility (28) | | |
| 1 | Section 4.2.1 Steward WEEE Return-to-Retail - Note that most of the issues cited for retail stores are issues for other potential collection sites as well. | Noted. |
| 1 | Given that, the 50 events proposed falls short of existing municipal special events, the Final Plan needs to be explicit that the projected numbers for Year 1 onward are in addition to the present baseline number of municipal collection events. As well, these events need to be considered and projected in a regional context. | Special event target in Year 1 has been revised to 200. |

| Comment / Frequency | | OES Response |
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| 1 | Page 64 Targets – Accessibility, Reduction, Reuse and Recycling. The projected doubling of municipal collection sites by year 5 presumes that the baseline number is correct and that many municipalities will be signing on to manage WEEE. | Noted. |
| 2 | Municipalities should not be the sole collection points other collection points should be encouraged. The Draft Plan should focus on recruiting non-municipal collection sites. | Noted. Refer to Section 5 for overview of collection system. |
| 1 | The Plan appears to rely very heavily on a municipal collection infrastructure that may not materialize. Contingency planning needs to accommodate the potential reduction in municipally-delivered WEEE programs. There needs to be greater emphasis on retail take back at stores and through delivery channels. | Noted. Refer to Section 5 for overview of collection system. |
| 2 | Locations for collection points must be developed based on: urban vs. rural efficiencies; by population, by distance and by time traveled by consumers; and, high population density issues. | Noted. Refer to Section 5 for overview of collection system. |
| 2 | A potential curbside collection system should be considered. | Noted. Section 5 provides examples of collection from individual generators. |
| 1 | Section 4.1.3; Contracted WEEE Collection Agents and Payment of Handling Incentive. RCO believes that OEMs and retailers could and should play a significant role in collection from their consumers. Those that do participate should be recognized and encouraged to invest in and expand upon these types of programs by being eligible for the handling incentive and having access to research and development (R&D) funding. In the case of OEMs, the handling incentive could be translated through a reduction in pay-in fees. | Noted. Refer to Section 5 for overview of collection system. |
| 1 | Arrival of non phase one materials on pallets needs to be addressed. | Noted. |
| 8 | Palletization is rather difficult and costly, it is not a preferred method, especially from special events we would rather see a reusable gaylord and it is more efficient. Disappointing that there is no flexibility with other packaging options. | Noted. Refer to Section 5 for overview of collection system. |

| Comment / Frequency | | OES Response |
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| 1 | How does OES plan to address the negative impact on the environment of the frequent collections and palletizing materials (e.g. vehicle emissions, shrink wrap and pallets)? | OES will use criteria in the transport service provider process to minimize environmental impacts, i.e. idling factor. |
| 1 | Accessibility is not clearly defined in the draft plan. | Noted. |
| 2 | Municipal participation needs to be voluntary. Program to offer their residents alternative collection options. (i.e. retailers, direct OEM take back, independent depots etc.). | Noted. All collection sites are voluntary. |
| 1 | RCO recommends that 100% of the infrastructure costs that support increase accessibility to participants be paid through OES. | Noted. |
| 1 | Retailers should be supported and incented to become collection points to provide another convenient collection option for consumers. | Noted. Refer to Section 5 for overview of collection system. |
| 1 | Retailers who host special events should be eligible to receive the handling incentive. | Noted. Refer to Section 5 for overview of collection system. |
| 1 | OEM- Alternatively the Plan may contemplate to translate handling incentives into OEM pay-in reductions. | Noted. |
| Collection/Accessibility Target (9) | | |
| 1 | 4.8.3 Collection Targets- Across all categories are low. It isn't clear why – where are the e.g., ~70% of TVs available for collection in year 1, but not collected, going? Also, residential targets should be separated from ICI targets. | Collection targets will be based on a kg per capita basis and not a percentage of what is theoretically available. |
| 2 | Year 1 collection targets are very low (29-53%, depending on WEEE stream). If these targets are met, will accessibility be considered adequate? What is the presumed fate of the WEEE that is available, but not collected? | Collection targets will be based on a kg per capita basis and not a percentage of what is theoretically available. |
| 1 | The targets are presently set too low for the Plan to be effective. | Noted. No suggested targets were provided. |
| 1 | Municipalities will accept the low amount of 48% in year 1 provided that the targets in years 2 through 5 are more aggressive and that OES will implement changes to its program (accessibility issues, education plans, etc) based on public consultation and research. Municipalities recommend that the year 2 target be at least 64% and rise to 75% and above by year 5. | Collection targets will be based on a kg per capita basis and not a percentage of what is theoretically available. |

| Comment / Frequency | | OES Response |
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| 1 | OES should establish a program to encourage better design by IFOs to phase out or replace materials that cannot be recycled such that WEEE eventually becomes a completely closed loop with all WEEE material being fully reused or recycled. In this respect we think the targets are low and more aggressive collection and recycling targets should be established. Given the environmental and human health risks posed by WEEE, OES should be targeting 100% collection in five years. | Collection targets will be based on a kg per capita basis and not a percentage of what is theoretically available. |
| 1 | OES needs to examine targets outside Canada, especially regions that have more experience and results. | Noted. |
| 1 | In its first year, the plan recommends a 48% recovery rate. By the fifth year, that target rises to only 64%. The plan falls drastically short on adequate recovery targets. Given the concern over the environmental impacts of the disposal of WEEE, the fact that the Province has a diversion target of 60% and that many municipalities, including Niagara, have set diversion targets, the plan should aim for a more aggressive recovery target. | Please note that there are no requirements for municipalities to participate. If municipalities choose not participate then it becomes the responsibility of OES to fill the void. Re: targets are not aggressive enough; please propose what they should be. OES understands that targets have to be clear. The responsibility to achieve the targets rests with OES. OES cannot require municipalities, retailer, or nonprofit organizations to run programs but the goal is to increase accessibility and we hope that more organizations will participate in this process. |
| 1 | People in towns or fairly populated townships should not be expected to drive more than say 40 km. If the subsidies made it so the EOLs would accept material for free, the municipalities could likely run their special/permanent depots and getting the material to EOLs with limited financial assistance (though they do need some technical assistance on how to run efficient permanent and special event depots). | Noted. |
| Reuse/Processing Target (20) | | |
| 1 | Section 3.2 Reuse and Refurbishing of WEEE –. There is little logic in including warranty activities as product flows in the administration, metrics or scope of the proposed program plan. | Noted. |
| 1 | Sections, i.e. 4.2.1 contain estimates of the proportion of reusable residential ‘WEEE.’ Further elaboration and clarification would be useful. | Noted. |
| 1 | Penalties should be issued for landfilled Phase 1 WEEE. | Noted. |
| 1 | There are no reuse targets in the Draft Plan. How effectiveness of the plan be measured without them. | See revised section 8.9.3 for Year 1 reuse targets. |

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

| Comment / Frequency | | OES Response |
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| 1 | Current targets and accessibility for recovery rates, (year 1 - 48% vs. year 5 - 64%) are not aggressive enough. The public is ready and willing to recycle WEEE and industry is ready to collect and process. | Collection targets will be based on a kg per capita basis and not a percentage of what is theoretically available. |
| 1 | Please provide us information on the Reuse task group and the key program elements included from this group. | The companies that provided comments on the reuse standard included: Computation, RCT, Reboot, GEEP, Sims Recycling, CAW- Computers for Kids. |
| 1 | We recommend that there must be a percentage of over 50% provided for reuse and refurbishment - of the most recent surplus electronic products i.e. within the last 5 years. | Noted. |
| 1 | What are the reuse standards and targets? | See Appendix 10a and 10b for reuse refurbishment standards and assessment process and reuse targets 8.9.3. |
| 1 | The plan indicates that end-of-lease equipment will be included in the reuse reporting which would wrongly inflate reuse numbers. This is not appropriate as end-of-lease equipment is not intended to be landfilled as the steward retains ownership. No diversion is occurring in this instance and therefore no environmental benefits occur. | Noted. |
| 1 | Plan encourages charities and NFPs that currently reuse WEEE to recycle instead of reuse. It also will increase charitable costs including auditing, reporting, collecting. | The plan allows reuse organizations to operate as they currently are and should provide some additional benefits including promotion, higher volumes and relief of transportation and EOL processing costs. |
| 1 | Reuse reporting standards are onerous as it asks for reporting on reuse without compensation for the data provided, it requires refurbishes to meet the same standards, eliminates ability to charge fees for service – charities. | Noted. However, no suggestions on compensation for reporting. Plan does not eliminate a reuse organization from charging a fee for service. |
| 1 | If there is no baseline established there can be no diversion measurement in the reuse category. | Noted. |
| 1 | What is the global reuse industry potential and in Ontario for new job creation in outlying communities? | OES did not assess job creation opportunities in Ontario. |
| 1 | RCO would recommend that OES’s members partner with their asset management companies to gather resale numbers in an attempt to set a reuse target within the context of the plan. | Noted. |

| Comment / Frequency | | OES Response |
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| 1 | It was requested that there be re-use diversion targets: why are there no targets? How will you measure effectiveness of plan without actual targets? How will you know that you are not impacting the existing market without doing a complete study of what is actually being re-used today? | There is no obligation for any organization to provide proprietary information. |
| 1 | Under the plan, these re-users will likely not receive the fee but will remain dependent on scrap metal value. | Noted. |
| 1 | Implementation of this plan complicates material management for the waste generators by causing them to create two diversion streams instead of a one stop solution which already exists within today's current market infrastructure. This increases costs and creates a further disincentive to reuse. The plan creates a disincentive to reuse WEEE and does not include reuse targets. It limits flow for reuse from collection points, creates an incentive for collectors to recycle in order to collect fees rather than reuse. | Noted. |
| 1 | Having solitary EEE retailer collaboration with ongoing take back and return services makes no public impression and curtails an individual's education. | Noted. |

| Comment / Frequency | | OES Response |
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| 1 | <p>Strengthen the Reuse and Refurbishing Standard by the following:</p> <p>Section 1.3 – Add the Interprovincial Movement of Hazardous Wastes and Hazardous Recyclables Materials.</p> <p>Section 4.1 – Records of testing must remain on site for 5 years.</p> <p>Section 6.2 – add “final” prior to end-use location. This is critical and will prevent sham reuse operators from brokering large parcels of reuse or refurbished WEEE to developing countries. This will also ensure that the reuse and refurbishing organizations have reliable data for the Reuse Targets</p> <p>Section 4.8.4 – “The number of units that contracted organizations has reported as being redistributed as whole units”. Otherwise, if lots are sold to brokers there is no way to know the actual number of units ultimately sold for reuse, nor their final destination.</p> <p>Section 7 – Add 7.4 “Provide a mechanism for the return of the product to the reuse or refurbishing organization when it reaches the end of its life for proper recycling”. In this way reuse and refurbished WEEE will not “leak” outside the OES system, nor is there a financial incentive for reusers/ refurbishers to act irresponsibly.</p> | <p>Suggestions were not approved by OES, but will be reviewed as part of changes to the standards based on operational experience.</p> |
| 1 | <p>Implementation of this plan complicates material management for the waste generators by causing them to create two diversion streams instead of a one stop solution which already exists within today’s current market infrastructure. This increases costs and creates a further disincentive to reuse. The plan creates a disincentive to reuse WEEE and does not include reuse targets. It limits flow for reuse from collection points, creates an incentive for collectors to recycle in order to collect fees rather than reuse.</p> | <p>Noted.</p> |
| 1 | <p>Sale of reused EEE should not be allowed if it cannot be guaranteed or refunds freely offered to defective merchandise. For Profit Stewards should be partnered with their expertise to assist in reuse new-use and in generating a profitable shared revenue stream.</p> | <p>Noted.</p> |

| Comment / Frequency | | OES Response |
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| Consolidation/Centers (14) | | |
| 2 | Review of consolidation zones. | The four consolidation regions are North, Central, South East and South West. Appendix 6 summarizes the communities that are in each region. |
| 1 | Collectors who recycle should not participate in consolidation. | Noted. |
| 2 | Should a processor establish a “transfer” station in close proximity to a consolidation centre, will OES consider this as the “distance to market?” | No. Distance will relate to primary processing activity. Simple transfer location will not qualify. |
| 1 | Section 4.3.2 Consolidation points. The costs associated with the operation of a consolidation facility should be reviewed. | Noted. |
| 1 | Section 4.2.3 should include a statement that waste material collected by a recycler would most likely be processed by that recycler and not be forwarded to a consolidation point. | Noted. |
| 1 | Elimination of the consolidator role. This step is redundant as it verifies required information. Recyclers should be permitted to be both consolidators and recyclers. | OES may eliminate the need for consolidation centres once the program has been operating for a period of time. |
| 1 | There is no need to separate the materials according to Section 4.2.1 - “Phase 1 WEEE” Efficient recyclers handle all of these products and do not need to receive them in a segregated manner. Segregation adds handling costs to the program. | Noted. The program must track and monitor WEEE for reporting purposes. If there is a way to comingle all WEEE and get accurate data by material type, a solution may be put forward. |
| 1 | Can you explain how the OES consolidation cost is calculated and what the \$12 dollars and 4\$ represent? | Refer to revised Section 5 for consolidation costs. |
| 1 | Slide 17 (from OES workshop): Distribution from consolidation centers needs to be equitable; as certain items yield greater value than others CPU's vs. Monitors. | Noted. |
| 1 | Consolidation centers need to expand scope beyond GTA. | Noted: consolidation centres will be selected based on a competitive process. |
| 1 | If a collector and processor are one and the same what is the role of consolidation centers? | Consolidation centres will receive WEEE from collection sites that are not processors. |
| 1 | Larger centralized consolidation depots if palletizing the material is considered critical. | Noted. |

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

| Comment / Frequency | | OES Response |
|------------------------------|--|---|
| Vendor Standards (31) | | |
| 2 | A clear guideline is required for fully understanding how OES will regard materials that would be considered commodities for export to non OECD countries. | The Electronic Recycling Standard has been modified to specify that Electronic scrap and hazardous materials)"...may not be exported to non-OECD or non-EU member countries, or processed with the use of prison labour, unless it is demonstrated by the primary processor that any/all destination downstream processors meet or exceed minimum environmental, health and safety standards equal to Ontario requirements. |
| 1 | Processors who demonstrate the capability to meet the standards should be included. OES should not exclude any processors who meet the standards. | Noted. Refer to revised Section 5.6 |
| 1 | There should be no requirement or need for a final user to make an 'end use determination'. They should rely on OES standards and information handling. No 'pre-generation' choice is necessary, nor should it be offered. | Noted. |
| 1 | What is to stop an EOL processor from dropping the price below current market because they are the only one with in a reasonable transport distance? | OES has no control over the price offering of processor service providers. Refer to revised Section 5.6 |
| 2 | Audit procedures and auditors need to be further outlined. | Please review the Appendix 9a, 9b and 9c for further details regarding the Electronic Recycling Standard, guidelines and qualification process. |
| 1 | Additional information is required to clarify the estimate costs related to carrying out an Audit for OES. Will this be an annual process? Can you provide an example of what would qualify as a change in the process for a REUSE/REFURBISHMENT company? | Audit costs for EOL processors who are being audited to the Electronic Recycling Standard are paid for by OES as it is an intensive process. The basic audit outlined in reuse standard is at the cost of the organization as outlined in the Reuse and Refurbishment Assessment Process in Appendix 10b. |
| 1 | Are there current OES approved processors/recyclers? | No. |
| 1 | Is the cost of shipping of WEEE scrap covered under the program? | Yes. |
| 1 | Can non -OES approved downstream processors be used by OES approved primary processors? | No. |
| 1 | Ensure standards are transparent. Can stewards own EOL processors? | Noted. Neither the nor the OES plan has the authority to address business ownerships. |

Ontario Electronic Stewardship Report on Consultation to Support Development of Waste Electrical and Electronic Equipment Program Plan

| Comment / Frequency | | OES Response |
|---------------------|---|---|
| 1 | Allow for time flexibility to allocate all required documentation for OES vendor approval. | Noted. |
| 1 | Clarification on tracking process. | Noted. |
| 6 | Export to non OECD countries-clarification required. | The Electronic Recycling Standard has been modified to specify that Electronic scrap and hazardous materials)"...may not be exported to non-OECD or non-EU member countries, or processed with the use of prison labour, unless it is demonstrated by the primary processor that any/all destination downstream processors meet or exceed minimum environmental, health and safety standards equal to Ontario requirements. |
| 1 | Standards – Can one organization, who meets all standards, be recognized as a collector, hauler, consolidator, reuser and processor? If so, can material flow directly to a final reusers/ processor? The present (draft) standard reads that the generator can still direct material flow. | Yes, provided the proper tracking and monitoring system is in place. The generator makes the choice of where to take or send its WEEE. |
| 1 | Grandfather in existing processors who carry out processing/recycling in an environmental sound manner. | Organizations who meet OES processor/collector standards that meet the highest environmental standards will be approved under the program. |
| 1 | Reuse decisions should be made by processors. If reuse has a greater value than revenue generated from recycling. | The WEEE generator decides at point of pick-up or drop off whether it is to be reused or recycled. |
| 2 | All processors who meet the OES standard need to be accepted. A closed vendor qualification is not competitive as it limits the number of processors is accepted. | Noted refer to revised Section 5. |
| 1 | OES should adopt a “zero tolerance” policy for any end-market that is currently shipping materials to non-OECD countries. | The Electronic Recycling Standard has been modified to specify that Electronic scrap and hazardous materials)"...may not be exported to non-OECD or non-EU member countries, or processed with the use of prison labour, unless it is demonstrated by the primary processor that any/all destination downstream processors meet or exceed minimum environmental, health and safety standards equal to Ontario requirements. |
| 1 | Can OES approved primary processors use a non approved downstream processor? | No. |
| 1 | If a recycler bidding in Ontario is already approved by EPSC standards through the BC program, does it have to re-qualify? | Yes, to ensure processors and sub contractors and downstream processors are in compliance. |

| Comment / Frequency | | OES Response |
|-----------------------------------|--|---|
| 1 | Will other sites of the same company which operate by the same standards, using the same sub vendors, need to go through the audit process? | Yes. |
| 1 | <p>The audit process should mandate on-site visit to gauge whether the policies and practices are implemented and adhered to on a daily basis.</p> <p>Start the audit process 6 months prior to the start of the program. The BC audit process has taken 8 months to date and is not yet complete.</p> <p>Should a processor decide to change its process or use different downstream processors or vendors than those already approved, new Document and On-Site Audits may be required which will not be covered by OES.</p> | <p>Noted.</p> <p>Noted.</p> <p>Correct.</p> |
| 1 | Halton Region established partnerships with certain e-waste contractors. Will a municipality be permitted to contract to these partners for event days or will we have to use OES approved vendor? | A municipality may choose to use any vendor it wishes. In order to be eligible to receive support under the program, OES approved vendors will be required. |
| Methodology (1) | | |
| 1 | Table 2.4 Lifespan Assumptions for Laptops requires clarification of data source. | Data provided in found in Appendix 7. |
| Energy Recovery (3) | | |
| 2 | Section 3.6 Description of Downstream WEEE processing prohibits incineration, energy recovery and landfill as diversion options. It is suggested that this limitation be revised to allow non-recyclable plastics as a substitute for fossil fuels. | Noted. Ontario MOE policy does not allow incineration, energy recovery and landfill as diversion. |
| 1 | Energy recovery should be considered as a diversion option. | Noted. Ontario MOE policy does not allow incineration, energy recovery and landfill as diversion. |
| Privacy Data Security (13) | | |
| 8 | Data Security certificates and guarantees are unclear within the Draft Preliminary Program Plan. Liability requires further clarification. | OES will have to review this issue in further detail and discuss with stakeholders |
| 1 | If OES places liability on the Reusers/Refurbishers, what will be their method of ensuring that everyone is playing on the same level? | Noted. |

| Comment / Frequency | | OES Response |
|---------------------|---|---|
| 1 | <p>Will the program compensate reuse/refurbishers for the costs associated with secure data destruction? Each level of data security service ranges in price (from a data wipe to full destruction). Did OES considered these costs when implementing the program and if so is it captured in the 165\$/tonne and 12\$ per pallet? If not will another fee proposed to cover for such services?</p> | <p>Noted.</p> |
| 1 | <p>Companies without existing Ontario operations would need to establish Ontario based facilities in anticipation of receiving work, develop their downstream process, go through the RVQP auditing, and then bid for work. The required investment in capital, personnel, leases etc would make this a very difficult decision to proceed. This would almost certainly limit new entrants into the marketplace, particularly in regions outside of the GTA.</p> <p>The recommendation: Companies which have demonstrated their ability to meet the RVQP standards in other provinces, and who have indicated an interest in establishing operations in Ontario, should be considered a qualified bidder for the purposes of the RFP without the need for a further audit. However, any new facilities would need to undergo the full RVQP process prior to any contract award.</p> | <p>Revised description of recycling standard and allocation process allows processors who have already been approved by SWEEP, ESABC, or RRFB to be provided a temporary approval pending final review by the OES auditors.</p> |

| Comment / Frequency | | OES Response |
|---------------------|--|--|
| 1 | <p>The lack of long term certainty of work will limit the ability of companies to make investments in the province, to establish capacity, and to retain the workforce. It is unrealistic to expect companies to develop capacity in an environment where bids must be placed every 6 months. There are also significant administrative costs for all parties with this arrangement. The net effect will be to keep program costs high and reduce the number of bidders.</p> <p>The recommendation. The contracts should be let for a 3 year period and the number of bidders should reflect the volume of work. For example, perhaps there should be a greater number of bidders for the GTA region than for other regions. Having 8 bidders in a region such as eastern Ontario may result in no one having sufficient ongoing business to justify the necessary investment.</p> | <p>Revised allocation process in Section 5.6 outlines a process where bids will be on an 18 month basis.</p> |

| Comment / Frequency | OES Response |
|---|---------------|
| <p>1</p> <p>All Ontario's entities should be allowed to continue to operate in a free-enterprise manner and select the processor of their choice as long as they are OES approved. Any greater participation by OES or government in the decision of where ABC Bank's e-waste is processed constitutes an interruption of the free-enterprise system. The solution could be as follows:</p> <ul style="list-style-type: none"> • OES is the champion to develop standards by which processors are evaluated and approved as "licensed e-waste processors in Ontario". • OES is the champion to develop legislation to stop e-waste from being dumped in developing countries and in landfills. • ABC Bank (school board, retailer, etc) selects from the list of approved processors whenever they have e-waste that needs processing. • If OES wants to keep the current funding model – no problem. Simply, establish a process whereby ABC Bank and the processor both submit the appropriate paperwork to OES to verify the transaction, and OES pays the tip fee to the processor. If desired by OES, that tip fee could be capped at a certain price per pound (which could be altered from time to time depending on established market factors – like an index). The waste generator is now free to choose the service provider that best suites their needs and if the cost of that service is higher than the OES payment, the generator is responsible for paying the difference directly to the processor. (Similar to getting dental work done... the insurance company pays a flat rate for a filling – but a patient can opt for a more upscale version and pay the difference if they wish. Under this model, collection sites and distribution centres could still be part the infrastructure with \$'s being provided for their services. | <p>Noted.</p> |

Comments on the revised version of the Draft Final WEEE Program Plan posted on March 11, 2008

| Comment / Frequency | | OES Response |
|---|---|---|
| Schedule A: Rules for Stewards (4) | | |
| 1 | <p>Section 2(1) of the Program Rules attempts to address this issue by designating a Brand Owner as a Steward for all EEE “to which it has a Commercial Connection”. Section 1 of the Program Rules, in turn, defines Commercial Connection as occurring when “a Person derives direct economic benefit when a particular EEE is Supplied in Ontario” [emphasis added].</p> <p>In our submission, the use of the indefinite article (“a”) introduces needless confusion and ambiguity and contravenes the requirements of Section 30(2) of the Waste Diversion Act (Ontario). Instead, we submit the definition should refer to “the particular EEE”. That way it is clear that that a Brand Owner is not the designated Steward for the particular EEE from which it derives no direct economic benefit. In consequence, the First Importer of the grey market or counterfeit EEE would be the designated Steward under Section 2(2) of the Program Rules.</p> | OES agrees with the comment raised and the final program Rules has reflected this change. |
| 1 | A Brand Owner should not, indeed can not, be required to accept responsibility for grey market and counterfeit EEE which it does not provide. The Brand Owner most often has no knowledge of the importation and supply of this product, which occurs without its authorization and against its wishes. | We agree that grey market and counterfeit EEE may be a challenge for OES to monitor and cannot be the obligation of the resident in Ontario Brand Owner if they have no knowledge of the EEE entering the market. |

| Comment / Frequency | | OES Response |
|---|---|--|
| 1 | <p>Section 2 (2) Designation of Stewards outline First Importer designation as stewards. It may be more convenient for the Canadian subsidiary to assume the reporting and payment obligation under the Program for that transaction because (1) it is already registered with OES and (2) it can obtain access to product data from its foreign affiliate. However, under the proposed Program Rules, the only way to achieve that result is for the Canadian subsidiary to enter into a Remitter's Agreement. This seems unnecessarily cumbersome when that subsidiary is already a designated Steward in respect of other EEE.</p> <p>The Program Rules should be modified to allow a Brand Owner to elect to act as a designated Steward with respect to EEE supplied by the Brand Owner's foreign affiliate or one of its foreign affiliate's subsidiaries sold to a specified First Importer.</p> | <p>The foreign affiliate would not satisfy the test because it is non-resident. So the Ontario subsidiary would be the Brand Owner and therefore Steward.</p> |
| 1 | <p>Section 6.4.4 Feb 11/08 Draft), it would appear that there is no recognition or incentive for those stewards who manage WEEE (subset or all) either out of province or using non OES approved vendors. Yet under this proposed plan, stewards who manage WEEE outside of province or outside of the OES program are still required to remit fee on per unit basis. Without having to submit a stewards own ISP for a subset of WEEE, can the OES proposed plan not offer or consider some kind of exemption under this scenario for specific WEEE materials?</p> | <p>Noted.</p> |
| Allocation of WEEE to Approved Processors (3) | | |
| 1 | <p>Section 5.6 Table 5.3 Evaluation Scoring Criteria outlines a bid weighting of 10% for distance from consolidation points. This weighting is not a sufficient incentive to establish operations in underserved areas of the province.</p> <p>Recommendation: The points awarded for distance from consolidation centers, particularly outside the GTA, should be significantly increased.</p> | <p>OES cannot dictate the establishment of operations in underserved areas of the province. Establishing regional consolidation centres will create an advantage for those processors who are located within each consolidation region, regardless of service level. OES will review the WEEE allocation process after the first allocation process.</p> |

| Comment / Frequency | | OES Response |
|---------------------|---|---|
| 1 | <p>Tables 5.4, 5.5 and 5.6 outline the percentage-allocation process in four regions. The allocation of waste material does not provide all bidders with a business volume adequate to justify the investment in plant and equipment nor does it lend itself to meeting the ongoing capacity expectations of the bid process.</p> <p>We suggest that all parties would be better served if there was a more even allocation of waste material. This would ensure the 3 bidders remain in the Ontario market and have the necessary business volume to finance plant and environmental improvements.</p> <p>Recommendation: In the above example, we suggest an allocation along the lines of 45/30/25. Other allocations where there are more or less than 3 successful bidders should be adjusted accordingly.</p> | <p>The allocation break-down for each consolidation region was designed to create incentives for high-level performance by WEEE processors. Under the Evaluation Scoring Criteria, the allocation break-down provides higher volumes as an incentive to the highest-performing bidders, without excluding other parties who do not perform to the same level of OES processing expectations. OES will review the WEEE allocation process after the first allocation process.</p> |
| 1 | <p>While a movement to 18 month contracts is a significant improvement from the most recent draft of the plan, we remain of the opinion that a 3 year contract would deliver better results and efficiencies to the program.</p> | <p>The 18-month contract term allows greater access opportunities to new entrants, requires continuous improvement efforts by processors, and ensures greater accuracy of projected WEEE collection rates available for allocation to processors. OES will review the WEEE allocation process after the first allocation process.</p> |
| Collection (1) | | |
| 1 | <p>The proposal affects iRecycle Computers, a small sized business, by limiting its ability to collect and transfer WEEE. In regards to the Inorganic Market™, we hope the OES is open to working with us to implement the proposed OES 'Round-Up' Events. It makes sense to use an existing and working system instead of creating a new one. Some further clarification would be helpful as to how iRecycle Computers and the Inorganic Market™ are impacted by the proposal.</p> | <p>The OES Program Plan requires collectors to meet a minimum standard for Performance, Compliance, and Sorting and Packaging Requirements as indicated in Section 5.1.2.</p> <p>All interested vendors must register with OES and complete all applicable requirements, as outlined in Section 5.0.</p> <p>OES 'Round-Up' Events will be hosted by interested retailers and/or municipalities, depending on regional accessibility needs. Please refer to Section 5.2.3 for more detail.</p> |

| Comment / Frequency | | OES Response |
|----------------------------------|--|--|
| Plan Implementation (1) | | |
| 1 | Who do we contact about working with the OES in implementing some of its plans? | All interested vendors must register with OES and complete all applicable requirements, as outlined in Section 5.0. |
| Phase 1 Material Definitions (1) | | |
| 1 | Portable computers comprising over 1700 tons of WEEE should be a separate category for collection, reuse, refurbishment and EOL processing and not be palletized with desktop computers. This will increase diversion, reduce specific associated environmental hazards and increase availability of portable computers for a major Ontario program supporting people living with a disability. | <p>OES has established six (6) Phase 1 WEEE material categories on which Steward fees are to be paid and upon which budget planning and projections have been based. However, these six Phase 1 WEEE material categories are grouped into similar-product groupings for the purposes of the OES Sorting and Packaging Requirements, outlined in Section 5.1.2.</p> <p>OES will review Sorting and Packaging Requirements during a the first year of operation. The current approach will be to have desktop and portable computers handled together. If there are advantages of handling portable computers and other types of WEEE separately that will be identified. OES will also need to evaluate options for integrating Phase 2 WEEE material collection with Phase 1.</p> <p>OES will work with all existing reuse and refurbishment organizations that are interested in participating in the WEEE Program in order to maximize reuse opportunities in the province. Please refer to Section 5.2.5, Section 7.2.4, and Table 7.9.</p> |
| Reuse and Refurbishment (1) | | |
| 1 | Section 7.4.2 Reuse and Refurbishment Organizations. Excellent proposal that would be very well received by community based technology organizations (non-profits, charities and local for profits) that require producer collaboration and public recognition assistance to effectively serve both environmental objectives and improved sustainability from their own reuse, refurbishment and EOL efforts. | Noted. |

| Comment / Frequency | | OES Response |
|----------------------------|---|--|
| Privacy Protection 1.8 (1) | | |
| 1 | <p>Page 7 incorporates several policy measures designed to protect risks including making the final user of the material before it is managed as WEEE and therefore the owner of the information contained partly responsible for determining if the material is sent for reuse, refurbishment or recycling. This clause would enable an end user to determine the destination without any responsibility for the diversion or environmental cost of such a decision. The decision may not be transparent to the general public as to the result of this action. This could provide the basis for the majority of computers to be sent to recycling instead of diverted to reuse and refurbishment.</p> <p>This proposed clause will be subject to abuse by some in how the end user is asked and there will be a danger to the WEEE diversion program if it becomes rampant.</p> | <p>OES will protect the generator's (end-user's) right to decide the ultimate fate of WEEE, whether from IC&I or residential sources. OES will not dictate the management of WEEE lease arrangements. OES will encourage and accept direct-ship IC&I WEEE materials to OES regional consolidation centres. Please refer to Section 5.2.4 for more detail.</p> <p>OES will be aggressively campaigning to educate and promote the various EOL WEEE management options, benefits and drawbacks available to all generators.</p> <p>OES will not assume responsibility for the privacy and security of WEEE managed under the program, but will instead require all collectors, reuse and refurbishment organizations, and EOL processors to meet a minimum standard for security. Please refer to Sections 5.2, 5.3 and 5.4 for more detail.</p> |
| Program Plan (5) | | |
| 1 | OERRA believes the OES plan is flawed from an environmental and economic perspective. Elements that foster investment, innovation and growth are virtually non-existent. In fact this proposed plan will truncate and restrict growth. To date OES has not utilized our collective knowledge to establish an effective plan. | Noted. |
| 1 | OES's rationale for its highly intrusive and disruptive IM model in the context of being unable to meet the Minister's program requirements any other way, its arguments are superficial, subjective and ultimately false. | Noted. |

| Comment / Frequency | | OES Response |
|-------------------------|--|--|
| 1 | <p>OES should retain the environmental standards, tracking and auditing components of its plan; but, eliminate the tendering process in its entirety; eliminate the consolidation and allocation of WEEE to processors.</p> <p>Setting financial incentives that are designed to improve the economics of collection and processing but that do NOT supplant existing market transactions that are based on price, quality of service and the ability to extract every last bit of financial value from collected WEEE (which often means exchanges of materials between primary and downstream processors); and setting processing incentives that are tiered to drive best reuse and recycling practices and meet reuse and recycling targets as well as to drive investment and innovation.</p> | <p>Noted. Please refer to Section 7.4.2 and Table 7.9 for further description of the economic implications and opportunities available to reuse and refurbishment organizations under the WEEE Program.</p> |
| 1 | <p>Fixed collection prices are insufficient to support integrated private sector proactive collection-processing operations but that are sufficient to fund municipalities using publicly funded (and marginally priced) hazardous waste depot infrastructure to passively receive WEEE from generators. The effect will be to re-channel a significant portion of WEEE out of the private sector collection-processing channel into the municipal system and from there into an OES controlled consolidation system.</p> | <p>OES does not utilize a 'fixed collection price'. A collection incentive of \$165 per tonne of Phase 1 WEEE collected, sorted, and prepared for transport to an OES Regional Consolidation Centre is available for <u>all</u> collectors meeting the requirements of the OES WEEE Program. This incentive was determined to assist collectors to cover the variable and fixed costs associated with meeting OES Sorting and Packaging Requirements. Please refer to Section 5.1.2, Section 5.1.3, and Table 5.1 for more detail.</p> <p>Municipalities may decide to participate in the WEEE Program as collectors, and are eligible to receive the collection incentive of \$165 per tonne.</p> |
| 1 | <p>Regional caps and the selection criteria (specifically price, capacity and distance) will be to reduce the number of collector-processors businesses in Ontario from an estimated 50 business to perhaps 5 at the most.</p> | <p>The only limitation OES has is the requirement to meet the Electronic Recycling Standard. OES would like OERRA's views on the Standard itself, and how many of the 50 business would be able to meet the Standard by program commencement.</p> |
| Comment Time Period (1) | | |
| 1 | <p>Disappointed that only four days were provided for comment. CWTA is unable to consult fully with its members, and unable to provide meaningful comments.</p> | <p>Due to the timeline determined by the Minister, OES was required to establish a four-day comment period on the Draft Final WEEE Program Plan.</p> |

Questions for Environment Canada

| | Comment / Frequency | Environment Canada Response |
|---|---|--|
| 1 | Does Environment Canada have plans to look at the issues of cross boarder US and Canada transport of WEEE? | Environment Canada is aware of the trans-border issues related with US/Canada transport of WEEE, however since this does not fall within our jurisdiction, Environment Canada can only discuss definitions of destination countries and their regulations. |
| 1 | Could you please clarify how Environment Canada views working used equipment? Is there a concern with declaring reused computers as working equipment for transport? | Environment Canada has never dealt with this particular issue; materials are declared and packaged as scrap therefore packaged accordingly. There is a large movement in South East Asia where countries are attempting to clear up what is considered reused WEEE, what can be refurbished, and what is WEEE. These countries are looking at technical quality of the material or the age as a factor. The Basel convention is also looking into the area of working materials. |
| 1 | Are all electronics hazardous as they may contain some hazardous waste/materials? If so, is their transport subject to the guidelines of the Basel Convention? If not tagged properly are they considered illegal to ship? Based on the answer I will receive from Environment Canada I will once again emphasize that OES targets will need to be increased. | All materials are subject the Canadian transport regulation and the regulation of a destination country. |

Questions Forwarded to Ministry of Environment

| Comment / Frequency | |
|---------------------|--|
| 2 | The government should consider the development of further incentives and initiatives to promote cost-effective Design for Environment. |
| 1 | The Ontario government should assess its current tax system and consider modifications that favour reuse and recycling activities over the extraction of virgin materials. |
| 1 | The Ontario government should establish a comprehensive waste management policy that includes enforceable targets and timetables and that mandates maximum diversion before disposal is considered. |
| 1 | To facilitate the achievement of Program diversion targets the Ontario government should strongly consider putting in place a ban on WEEE in landfills. Ontario and Canada should recognize the economic implications of this trend towards toxics reduction and work with Canadian stewards, particularly smaller stewards that are less likely to have reduced the toxicity of their products, to move in this direction. The Ontario government should then bring in regulatory requirements comparable to the EU's RoHS Directive. |
| 1 | In the context of a comprehensive waste management policy, the Ontario government should work with WDO to set ambitious collection and reuse and recycling targets that aim to achieve significantly greater diversion than a business-as-usual scenario. |
| 1 | The provincial and federal governments should lead by example with regard to electronics purchasing, use, reuse, and disposal by introducing standards for government agencies to follow in their procurement and end-of-life management strategies |
| 1 | School curriculums should be designed to include information about sustainable WEEE management including pollution prevention and diversion at every stage of the product's lifecycle. |
| 1 | The Minister of the Environment needs to ban all WEEE from landfills public and private with a 6-12 month compliance period. |

Appendix II

Waste Electrical and Electronic Equipment

Online Comment Survey

**Comments Received Through On-line Questionnaire
on January 14 Version of Draft Preliminary WEEE Program Plan**

Ontario Electronic Stewardship (OES) provided stewards and stakeholders with various options to submit comments on the January 14 version of the Draft Preliminary WEEE Program Plan. One of those options offered an opportunity to use an on-line “comment form” that highlighted the key issues that participants raised during the Workshop/Webcast #3. The option to use the form was included in an OES newsletter which was distributed to all contacts on the OES mailing list on Monday, January 28th following the Wednesday, January 24th workshop/webcast.

OES received a total of 18 on-line survey forms, nine of which had been completed. An additional nine forms were submitted but were incomplete/blank. The individuals/companies that submitted blank forms have been contacted to determine if the intention had been to submit comments using the on-line format and that, for some reason, the comments did not register. The outcome of this has yielded no additional survey responses.

The following submitted comments through this mechanism:

ARTEX Environmental Corporation, Vic Parish

CAW Local 200 Computers for Kids, Chris Davies

Ewaste Management, Don Leibold

FCM Recyclage Inc., Mitchell Rothstein

Manufacturing & Technology Centre, David Barnes

Motorola Canada, Carly Biggart

The Salvation Army, Bill May

Foxy Recycling, Mike Hughes

Computers for Kids, Carrie Schroeder

KIMCO STEEL Sales, Bill Logan

Apple Canada, Marek Jurkiewicz

Kodak Canada, Rosemary Mandatori

REIC Perth, Alfred Von Mirbach

Toronto Recycling Inc., Jason Lim

GEEP International, George Craine

Comments Received Through On-line Questionnaire on January 14 Version of Draft Preliminary WEEE Program Plan

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|--|
| <p>Question # 1: For the purposes of inclusion in the OES Program Plan and in monitoring progress towards targets, should all WEEE, including material returned on leases, customer returns, warranty returns, etc. be treated the same as WEEE collected through all other channels?</p> |
| <p>Yes Answers: 6</p> <p><i>Please explain your position:</i></p> <ul style="list-style-type: none"> • All WEEE regardless of origin should be treated the same way if it is recycled through an EOL or collector. • If the intention is to divert from landfill then all material should be treated the same. This would prevent the material from finding its way to a black market that will become more aggressive with a shrinking supply. • All of these materials need to be recycled regardless of origin. To add costs to the manufacturers/retailers for handling their own waste seems excessive. • At first my answer to that was going to be why be paid anything as they are companies that have helped to contribute to the problem that we have today. Now after the meeting I don't feel that way anymore, as you need to make it fair & level (Collecting field) across the board to make it viable for each company to collect the Phase 1 units. We can't be a collector if Phase 1 units & only breakeven on cash flow derived from phase 1 it must be economical for all parties involved. This will help to create level recycling service across Ontario. • Only if the WEEE is going to EOL.. |
| <p>No Answers:2</p> <p><i>Please explain your position:</i></p> <ul style="list-style-type: none"> • The streams know how to put into reuse best when they are done, whatever is left can be processed by local processors. • Our service centers are the only approved centers to deal with warranty returns, DOAs, etc. and refurbish. We do not have third parties refurbish. |
| <p>Question # 2: Should stewards providing WEEE collection through all of these means receive the handling incentive?</p> |
| <p>Yes Answers: 5</p> <p><i>Please explain your position:</i></p> <ul style="list-style-type: none"> • The Steward should be eligible because that will help provide additional locations and cast a bigger net to collect the material. The incentive will partly cover some cost the Stewards should be encouraged to play a role from cradle to grave. • Once again as long as it goes to EOL. • Everyone in the collection side of WEEE needs to receive collecting fees. Why? No one is running a business to just break even; there needs be proper incentive to not only break even but to make profits. Otherwise the company will not generate enough cash flow to continue to operate efficiently & effectively. WEEE Program must create a fair market place for everyone to operate as a collector. Also being able to adapt the program to major collectors as they will need an abundance of collected WEEE phase 1 materials to make sure they can make profit on what is collected & repackaged up properly. Have the program evaluated on larger collectors/Consolidators to make sure everyone is cost effective for the program. For the collector on a 3 months basis in the first year to make sure everything is cost effective for everyone. This must be done so that everyone is working in efficient & effective processes. • Any retail outlet already has revenue and running capital, we at e-waste management charge the retailers a small fee. I suppose it can be an option for the government to pay for the WEEE if this helps the retailer stay in business. • If part of the program, they should receive some incentives. One must make sure that there is a level playing field. • They would be contributing their time, effort and manpower no differently then others. |
| <p>No Answers: 2</p> |

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| <p><i>Please explain your position:</i></p> <ul style="list-style-type: none"> Any retail outlet already has revenue and running capital, we at e-waste management charge the retailers a small fee, I suppose it can be an option for the government to pay for the WEEE if this helps the retailer stay in business. If part of the program, they should receive some incentives. One must make sure that there is a level playing field. |
| <p>Question #3: Is the handling incentive fair and appropriate?</p> |
| <p>Yes Answers: 6</p> |
| <p><i>Please explain:</i></p> <ul style="list-style-type: none"> Except that the cost of materials should be taken on by the OES. The proposed fees and scheduled review seem reasonable in the absence of any hard cost data. Here is breakdown on the costs of services that we would provide: To pick up & package phase 1 materials: we charge \$an hour to pick up & package phase 1 materials from time of leaving our shop to arrival time back from the pick up: You get one 5 ton truck & a driver to load the shipment Additional help is \$ an hour o To Recycle Phase 1 material's: we are charging \$Full Computer system (Monitor, Pc tower, Key board, mouse, all Wiring & cables) o To Recycle Phase one CRT monitors & CRT TV screens: 14 inch & up \$each CRT Monitor or CRT TV recycling fee's charged to Customers Foxy Recycle Cost to recycle monitor \$ each screen o To Recycle Phase one CRT monitors & CRT TV screens: 19 inch & up \$each CRT Monitor or CRT TV recycling fee's charged our company Cost to recycle monitor \$each screen o To Recycle Phase one LCD TV screens: 15 inch & up \$each LCD screen recycling fee's charged. • Lets create an example of 100 monitor recycling Charges: o To Pick up a lot of 100 monitors: we can fit 24 to 30 monitors on one skid approximately 5000lbs each skid monitor being 50lbs Size 14 : load is ready for pickup; no packaging of load o Pick up charge \$/an hour to pick & transport load of Phase #1 material's o 3 hours are a regular rate for a pick & transport of Phase 1 material's o Environmental charge for recycling of 100 monitors all monitors are 14 inch & up at \$ each monitor total of \$CDN billed to customer recycling Environmental recycling Charge: \$ each monitor total at \$CDN for our company charge paid to our company recycle total charged to customer \$CDN for recycling & transportation costs o Foxy Recycle Fee's paid to Recycle Monitors environmentally friendly \$ billed to foxy o Foxy Recycle Profit is \$CDN right no: I have Fuel \$100, insurance \$, pay for Truck driver(8 hours) \$ an hour total \$, rent on building\$, that profit will now become: \$total profits. If we recycle the collected the monitors & charged the \$165/tonne we will make \$on the collection of Monitors. You must now minus administration cost which leaves: \$CDN total profits to continue operations. At the \$165/ton this will be feasible to run as Collector/Consolidators. But as the program moves forward I can see that collection rate might have to go if we are not receiving enough phase 1 material's are sent to that facility. At the beginning of the program it will be hard till the payments are started after that 3 month payment process. Many companies will need some compensation before that 3 month period. That can be evaluated on a regular basis. This must be done 20 times a month to meet all of our administration costs with still continuing our daily operations. We must continue to operate with our other daily operations to continue generating enough revenue to run a viable recycling service. For the gatherers. The incentive is adequate, it is enough to cover cost to collect, and the added benefit is the traffic this will create to locations that have a retail component to their business. |
| <p>No Answers: 1</p> |
| <p><i>Please explain:</i></p> <ul style="list-style-type: none"> There may need to be some variations depending on the constraints and collection methods. |
| <p>Question # 4: Do you agree with the proposed handling approach of using shrink-wrapped pallets and gaylords or bulk bags?</p> |
| <p>Yes Answers: 5</p> |
| <p><i>Please explain your position:</i></p> <ul style="list-style-type: none"> I agree with the proposed method to start as long as the plastic film is recycled; presently used Gaylord can be purchased for \$ 6.00 and are double stackable. Would like to eventually see metal cages used as a returnable handling system. Yes I do agree with process as this is how we have been shipping all of our WEEE Phase 1 materials already. I'm just not sure if 1.7M height will be |

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| <p>efficient in shipping the skids unless we can double stack pallets. Are we going to be allowed to double stack skids if it can be done safely & effectively to utilize more space on the tractor trailer. We stack up monitors so that you can fit 24 to 30 monitors on one skid. Wrapped in shrink wrap & make an X on Each side of skid with the shrink wrap. Will have to show example if need be. I have never had one my skids fall over in transport EVER you can ask FCM.</p> <ul style="list-style-type: none"> • Using yard bins reduces the chance of reuse. • We currently do this, but at the same time we recognize that a better method for television packaging should be considered. | |
| <p>No Answers: 2</p> | |
| <p>Please explain your position:</p> <ul style="list-style-type: none"> • There are various collectors/events, etc. that will and have limitations as to facilities, space and other constraints and other handling methods such as roll-offs, transport containers, etc. should be considered. • I think stacking monitors and TV's to a height of 1.7 meters is hazardous. These units are not uniform in size and design and I worry that they could fall while being stacked and result in injury. The Occupational Health and Safety Act require an employer to take every precaution reasonable, within the circumstances, to protect the worker. I don't believe we have met this threshold. I would be curious to know the Ministry of Labour's position on this topic. Further, the cost of shrink wrap and labour for the stated method is an ongoing cost. The use of gaylords is a one time cost, and will make collecting and stacking easier and safer. | |
| <p>Question # 5: For municipalities: please provide the number of permanent WEEE collection facilities and/or the number of collection events that are currently offered in your community.</p> | |
| <p>Permanent Facilities: 3</p> | <p>Collection Events: 3</p> |
| <p>Question # 6: Do you have other comments to make about collection issues?</p> | |
| <ul style="list-style-type: none"> • Yes, but this should be in discussions on how to handle collections. • Reuse organizations should be considered the front line for collecting WEEE. This method provides the most efficient model for the use of collecting WEEE. • The definition of collection site should be altered. The Salvation Army, National Recycling Operation, has 30 stores. All of these locations currently receive WEEE and they ship it via our trucks to the Salvation Army warehouse where it is packed and shipped to recyclers. Under the plan, they want collection sites to palletize and ship from the site, something my stores do not have the staff, space or materials to accomplish in their stores. I would like to see the store remain designated collection sites, and benefit from the associated advertising and web listings, but still allow the product to be shipped to our warehouse where we have facilities and manpower to palletize the product. It could then be picked up there by the approved OES carrier. This philosophy could be used in partnering charities with municipalities. We could collect, on behalf of municipalities, WEEE and transport it back to a warehouse for palleting and pick up by an OES carrier. It would create a level playing field with those charities doing home pick ups and taking the product to a central warehouse. • The Collector/ Consolidator might be an option to combine the service. As you ship WEEE to a collector. Once they have enough WEEE collected they ship to consolidators but if we just consolidate everything at a larger collector they can now cut out the double handling of the products. As the collector should be shipping directly to processor not the consolidator. Double handling will be happening a lot is we have 2 services basically doing the same thing. | |
| <p>Question # 7: Is the establishment of regional consolidation centres throughout Ontario appropriate to support the tracking and auditing requirements of the WEEE program?</p> | |
| <p>Yes Answers: 6</p> | |
| <p><i>Please explain why/why not</i></p> <ul style="list-style-type: none"> • With the quantity proposed, there must be more than one port of entry, as long as the tracking and auditing is coherent. • Okay for phase I may need to revisit for phase II. • Although, I would like to see these phased out as I think it creates unnecessary spending. | |

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| <ul style="list-style-type: none"> • Yes and NO Collection centers should be ok for smaller collectors but larger collectors should be able to send direct to the processor, if this provides some savings to the program then an incentive could be passed on to the larger collector with the approved scales and reporting system. Collection centers should be cross-dock facilities to encourage fast turnaround of material and minimize exposure of material for security reasons. • As an EOL processor, we have/are establishing these already in order to develop an infrastructure that can support the feedstock requirements/logistics needs of our facility. |
| <p>No Answers: 1</p> <p><i>Please explain why/why not:</i></p> <ul style="list-style-type: none"> • Yes we need to have consolidation centers but really a larger collector can do these services without double handling would be beneficial. It will be good to have the four regions to help track all WEEE along the recycling process. But it really should a collector/Consolidator combined services. A consolidator will NOT receive enough payment if all they receive is \$12/a skid or \$4/aton. Not feasible to run a business at these rates. If they are combined then it would be cost effective to do so. |
| <p>Question # 8: Will the establishment of regional consolidation centres throughout Ontario minimize transportation costs across the system as a whole?</p> |
| <p>Yes Answers: 3</p> <p><i>Please explain why/why not:</i></p> <ul style="list-style-type: none"> • As we at FCM handle much recycling in the Ottawa valley region, customers confirm that this is a cost savings, rather than shipping to Toronto. • In order to transport materials in an economical fashion and in order to lower the carbon footprint, these centres will need to be established as load sizes may vary from generators. • Yes for smaller collectors, no for larger collectors. The extra handling is not value added and only increases the cost, reporting can be done at the larger collection centers with the appropriate controls in place. |
| <p>No Answers: 3</p> <p><i>Please explain why/why not:</i></p> <ul style="list-style-type: none"> • Tracking and auditing can be done by experienced collectors therefore eliminating that cost. • Since we currently ship by the trailer load, this will mean loading, unloading, verifying and reloading to final destination. The shortest distance and cheapest between two points is direct. Consolidation will only make sense for those shipping less than a trailer load. Perhaps, a OES representative, at each processing site would be better, not unlike Federal Meat Inspectors in slaughter houses. This would save on warehousing costs and would allow for closer observation of the process. • I think it would help cut down the transportation costs but I think that you're creating a lot of double with having consolidation centers. Plus if they don't receive the \$165/a tonne to collect only consolidation fee's NOT feasible to run a business at those costs. |
| <p>Question # 9: Should OES direct approved collectors to deliver their recovered WEEE to a designated OES consolidation centre?</p> |
| <p>Yes Answers: 3</p> <p><i>Please explain why/why not:</i></p> <ul style="list-style-type: none"> • This depends on how the program will be implemented. What are the conditions, payments, of the recyclers. • All WEEE not already processed needs to be sent. • Only when cost effective vs. sending direct. |
| <p>No Answers: 3</p> <p><i>Please explain why/why not:</i></p> <ul style="list-style-type: none"> • Consolidation centers are redundant. Verification of what arrives at the EOL processor or reuse facility is what matters. Verification can be accomplished without re-handling and warehousing of product between collection and final destination. • Depending on location, volume, etc., there may not be a need for a collector to ship to a consolidation centre and it can be ship directly to and EOL processor. |

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| <ul style="list-style-type: none"> To a point this should be done. If it is the most economical to transport to closet Consolidation center then OES should direct it that way. I still think that we don't many of these consolidation centers. Maybe have one consolidation center for each region for the rural area's as they would need a center to help cut down transportation costs. We must combine services to cut out all the double handling of Phase 1 materials. In Populated area's not as many consolidation centers more combined services again eliminating double handling in the larger cities. | |
| Question # 10: Under what conditions should an approved collector be authorized to deliver WEEE to an OES approved EOL processor? | |
| <ul style="list-style-type: none"> When they have a proven tracking system, as well as a proven sorting and packaging system in place. Collectors should prepare the loads and ship directly to EOL processors. OES inspectors can verify shipments arrive and processed according to standards. If they are a very large collector in our populated areas will help skip the step of consolidation centers as we can combine both services in the larger cities. Each collector does and will process amounts of WEEE to help pay for expenses example/ the working centre in Kitchener repairs units what they do not tear down they pass to e-waste management for processing E-waste Management purchases materials from them that they have already processed as well to help pay for more expenses. As long as loads are properly accounted for and weighed before and after to account for any diversion to refurbish/reuse etc., and communication is transparent, their should be no need to have any issues. When it cost less to the system to send direct. When the transportation method is more environmentally friendly to send direct (trains). Collector must have approved Canada Weights and Measure scales to keep the processor honest. | |
| Question # 11: Do you have other comments to make about transportation and consolidation issues? | |
| <ul style="list-style-type: none"> Our concern is that primary processors should be kept as regionalized as possible to lower transportation costs. Just to combine the service of collector/ consolidator as one service in very populated areas. That will cut out double handling & less transportation of the Phase 1 materials. Each smaller collector processor (cherry picks) to pay their expenses. Each larger processor processes volume and has less ability to test or repair for reuse, consolidation can allow for redistribution of collected volumes for individual unit types for companies would can disassemble units of like type and brand more efficiently then shredding and use less power to do it also increasing reusable material volumes We already have set up/and are setting up other regional hubs/consolidation centres for collection. Can we operate as both a processor and collector/consolidator. I would encourage the use of trains and transportation companies that use off peak hours to transport. No. | |
| Question # 12: Do proposed standards ensure adequate environmental, health & safety standards for OES approved operators? | |
| Recycling Standard | Reuse Standard |
| Yes Answers: 6 / No Answers: 0 | Yes Answers: 6 / No Answers: 0 |
| <i>If no, how should they be changed?</i> | |
| <ul style="list-style-type: none"> Need to review Motorola standards to compare. (Note: comment participant who did not answer yes/no to either recycling or reuse standard). | |
| Question # 13: Do you believe your existing reuse & refurbishment organizations meet these standards today? | |
| Yes Answers: 1 | |
| <i>Please explain why/why not:</i> | |
| <ul style="list-style-type: none"> They can be educated further on how to improve conditions. | |
| No Answers: 5 | |
| <i>Please explain why/why not:</i> | |
| <ul style="list-style-type: none"> Not sure need to look at versus Mot. Motorola has very high reuse and refurbishing standards. As previously stated we do not allow third parties to | |

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| <p>refurbish due to liability concerns.</p> <ul style="list-style-type: none"> As a non-profit organization, we have taken major steps in reaching the requirements, yet due to limited resources, we are not in full compliance yet. I think it is logical to presume there are some organizations flying by the seat of their pants in the absence of clear defined guidelines. We might have a few standards that we might not pass but I'm not totally sure. As our refurbishment center is very small & at times we will just recycle the goods as they will not be resalable to out dated. It is not a major revenue generating portion of our company. Very small portion of revenue. Our experience and downstream audits of existing facilities have shown that these standards are not being followed by many of these organizations and they continue to work in a questionable manner. I am sure we are close, it is achievable. This program will help raise the bar so that companies and employees will be better off having participated. Consumers will benefit from the data security and warranty provisions of the plan. |
| <p>Question # 14: Do you have other comments to make about reuse and recycling standards?</p> |
| <ul style="list-style-type: none"> This is a tricky slope. As this currently is an open market with many different standards, it would be good to have a reuse/recycling standard for consumers to refer to. Standards shouldn't limit non-profit organizations too harshly due to the limited resources that they have, as well as the fact that Phase 1 materials go back into the community for reuse, and not for sale. Our organization is more than willing to comply to these standards but due to the extra costs that will be incurred, compensation of some type should be considered for these types of organizations. No Not really. Would like to see more of a push towards reuse. There clearly needs to be more harmonization across provincial boundaries of the legislation to ensure that these standards are consistently met. |
| <p>Question # 15: Regarding standards for processing WEEE, do you believe that your operation/facility meets these standards today?</p> |
| <p>Yes Answers: 3</p> |
| <p>No Answers: 3</p> |
| <p><i>If no, what is needed to bring your operation in compliance with this standard?</i></p> <ul style="list-style-type: none"> We are strictly collectors. We have been running as a collector of WEEE products. We do a few of the processing steps in our facility let me explain: We only take the PC towers apart & place all recycle in the appropriate bins for proper Environmental recycling of all products out of a PC tower. We only stack up monitors; we can place 24 to 30 on one skid. Then we stretch wrap them to my standards. As I had explained in the Collection portion. To a point we run as a processor but not compromising any CRT screen or batteries, everything is handled in the proper way. Given the volume and the location of our operation, we will not be considering applying to become a primary processor. |
| <p>Question # 16: Do the proposed weightings applied to the evaluation criteria for assessing RFP responses provide sufficient incentive to optimize the quantities of materials recovered for recycling?</p> |
| <p>Yes Answers: 2</p> |
| <p><i>Please explain your position:</i></p> <ul style="list-style-type: none"> Over all it looks like the \$700/a ton to process would be satisfactory. I'm not sure how to quantify my recycling sales/stock to become a processor. Like the example I gave for collection of& recycling of 100 monitors) As I have to pay to dispose of my monitors & if I take them apart now your going to pay me \$700 a ton? Do you see where my dilemma is? Having hard time giving an example as they will not be congruent between both processes. |
| <p>No Answers: 1</p> |
| <p><i>Please explain your position:</i></p> <ul style="list-style-type: none"> We feel that more clarification is needed. |

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| <ul style="list-style-type: none"> • Unknown... outside our area of interest. • Not sure. |
| Question # 17: Are the assessment weightings in the draft Assessment Criteria Table shown above appropriate? |
| Yes Answers: 3 |
| <ul style="list-style-type: none"> • Experience in the industry might be the only thing I would have more weight on. You need to experienced recyclers to understand exactly what you need do with each different phase 1 material's. Having the knowledge & expertise to pass on to all the processors to help create a standard of dismantling of units across Ontario is very important. |
| No Answers: 2 |
| <i>If no, how would you change them:</i> |
| <ul style="list-style-type: none"> • We believe that experience should have more value than licensing. • There is not enough information for how the weightings are assessed on individual weightings to give a valid added opinion and seem at face value to be fair. • I would place a little more weighing on experience. |
| Question # 18: Should processors expect OES to guarantee a minimum quantity of WEEE to be processed in order to prepare cost proposals for processing services? |
| Yes Answers: 4 |
| <i>Please explain your position:</i> |
| <ul style="list-style-type: none"> • For cost efficiencies. • You will need to know a minimum quantity so that you can operate efficiently. It will be just like sales man that doesn't hit his sale quota. We need a minimum quantity to know that we can have enough processed to run effectively & efficiently. If we don't get enough phase 1 material's we will have to find other ways to generate money. Yes we will have to continue our other daily operations as we need all services to working together to make this program efficient. Can run if we are just breaking even need to see profits or there in no reason to do this service other than the fact that we HAVE TO START TO Recycle everything that we produce as human kind. Yes we will minimum quantities other wise not cost effective. • Each EOL operates under different business models and hence needs to have a certain quantity of WEEE to process in order to run effectively and generate enough revenue to sustain adequate profit margins. |
| No Answers: 2 |
| <i>Please explain your position:</i> |
| <ul style="list-style-type: none"> • If the guarantee wasn't met, who would incur that cost? • These business are already operating yes processors are working on a shoe string budget and a minimum will help relieve the stresses of chasing funds and allow processors to focus on their jobs but is the minimum determined on an individual basis or is the minimum the same across the board. giving a minimum may take away the push to work for it. |
| Question # 19: Should processors expect OES to guarantee a minimum quantity of WEEE to be processed in order to prepare cost proposals for processing services? |
| Yes Answers: 4 |
| <i>Please explain your position:</i> |
| <ul style="list-style-type: none"> • Same question as # 4. • For cost efficiencies. Same question as above? • You asked this question twice regards |
| No Answers: 2 |

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| <p><i>Please explain your position:</i></p> <ul style="list-style-type: none"> • Same question as #4. • Individual processors know their processing capacities and can work directly with collection and consolidation for more efficiency. |
| <p>Question # 20: Should a processor also be registered as reuse organizations under the OES program?</p> |
| <p>Yes Answers: 2</p> |
| <p><i>Please explain your position:</i></p> <ul style="list-style-type: none"> • Currently, most of the OEMs that we deal with prefer to have recyclers separate from reuse organizations. • Yes, they will have the option to do so or have the reuse portion of the business to be outsourced to a professional reuse/refurbished. Do not have to become registered; it will be an option for the processor to do that operation. • If they have the ability to do so. |
| <p>No Answers: 3</p> |
| <p><i>Please explain your position:</i></p> <ul style="list-style-type: none"> • Collectors should be the first choice for reuse. It is the most efficient model to use and it doesn't monopolize the market. • I think processors should be able to focus on the area of their greatest strength and profitability. Reuse should be encouraged but not required. |
| <p>Question # 21: Do you have other comments to make about primary and downstream processing?</p> |
| <ul style="list-style-type: none"> • It is imperative that primary processors NOT be considered for reuse. It makes no sense that they would reuse. • It costs my company money to dispose of each CRT screen that we recycle (in an) environmentally friendly way. In this proposal are you saying that you are going to pay me \$700 a ton to recycle the CRT screens? Am I understanding what the message is in the proposal plan? • Everything has a place... there is no excuse for any land fill in our day of age. |
| <p>Question # 22: Can you provide any further data that would help to improve the generation & recovery projections?</p> |
| <p>Yes Answers: 2</p> |
| <p><i>If yes, please provide:</i></p> <ul style="list-style-type: none"> • Will provide for phase II. • The Salvation Army collects a total of approximately 40,000 lb of Phase 1 WEEE, not including TV's, every two weeks from our 30 stores and one warehouse location. We have no TV recycler available and currently throw approximately 5-10 TV's per day in the garbage. • We can weigh each part of a given unit if it's required; we expect it to be an R&D cost. We are open to other information gathering infrastructure, if you have templates for use or example, we will review them. |
| <p>No Answers: 4</p> |
| <ul style="list-style-type: none"> • I have sent REOI with all of my figures of what were recycled in 2007-08. I'm not sure of what else I might be able to provide. |
| <p>Question # 23: Can you provide similar data for reuse & practical suggestions for reuse targets?</p> |
| <p>Yes Answers: 1</p> |
| <p><i>If yes, please provide:</i></p> <ul style="list-style-type: none"> • Will provide for phase II. • Let's create new markets. China and Japan are far ahead of us in the robotics industry, if we can supply inventors with affordable prototyping parts they will need new parts to create new lines of product electrical devices tend to use more then one voltage and new design uses the lower voltages any parts in WEEE that use 3.3, 5, 6, 9, 12, voltages can be reused to developed lower voltage technologies |
| <p>No Answers: 5</p> |
| <ul style="list-style-type: none"> • The data submitted complies with what our organization currently experiences. As for practical suggestions, the primary reuse target should not be resold, but should be considered to be distributed through donated placements in different communities. |

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| Question # 24: Are collection & recycling targets set out in the draft plan reasonable and achievable? |
| Yes Answers: 5 |
| <i>Please explain your position:</i> |
| <ul style="list-style-type: none"> I believe so. Due to the fact that the amount of collection points will decrease due to this plan, our main concern is that there will not be a sufficient amount of collection points to handle the estimated increase. The projections are reasonable with the data that you have been provided. Now I can see the projections will be changing even in the first 3 months of the project as we will have a better understanding of what is needed to be collected/consolidated/processed on a 3 months basis & continuing evaluation is on going process. I think the project will be continuously evaluated all the time so I can see that being a staple in our process. The collection & recycling targets are only estimations. It is good we have a starting point to focus on. I believe that these targets can be exceeded with the right amount of promotion and incentive through public participation in events, etc. |
| No Answers: 0 |
| Question # 25: Do you have other comments to make about data projection and targets? |
| <ul style="list-style-type: none"> Residential collection will be covered under the plan, but there is a significant hole for the collection of commercial WEEE. Figures will change a lot once implementation of the project (occurs). Understand that there might be a lot more Phase 1 material out in the market then anyone really realizes. Figures will change once we can see numbers on what is actually needed to be recycled, not just what has been reported to you the program developers. Can we collect more information from smaller organizations? We are still very early in the process to realistically determine very accurate projections. Our data and results confirm that expectations for WEEE collection will more then likely exceed any targets. |
| Question # 26: Does the proposed fee setting methodology share these program costs in a fair way and transparent manner? |
| Yes Answers: 5 |
| <i>Please explain your position:</i> |
| <ul style="list-style-type: none"> Mostly all the fee's look like they will be set a reasonable rates to continue & operate at efficient capacities. So long as we have a minimum quantity that will keep the bills paid & continuing to generate profits to help move the program forward. If all transportation costs are handled by the WEEE program. Then it is cost effective, but if we have to ship, handle & transport Phase 1 material's it will not be cost effective to that operation to. They seem fair, It will be nice to go a year to see how it works and allow for change in the coming years. As a method it is sound. As a practical form, it is yet to be decided. |
| No Answers: 1 |
| <i>Please explain your position:</i> |
| <ul style="list-style-type: none"> There needs to be more flexibility in fee setting as it is unrealistic to expect that only designated WEEE will be collected in public events or through municipalities. How will to fees reflect this? |
| Question # 27: Is the proposed fee setting methodology clear and transparent? |
| Yes Answers: 3 |
| <i>Please explain your position:</i> |
| <ul style="list-style-type: none"> Over all, it is transparent. The only (thing) I'm not sure (about) is the \$12 a pallet or \$4 a ton for consolidation? That is really the only thing that is very unclear of what your trying to project. Can you explain that to me? Same as #1 |

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| <p>No Answers: 1</p> <p><i>Please explain your position:</i></p> <ul style="list-style-type: none"> • It is not so clear and transparent. There are many unique costs to the development of a proper recycling method / program. |
| <p>Question # 28: Do you have other comments to make about fee setting issues?</p> <ul style="list-style-type: none"> • Just need the explanation of the consolidation fees methodology? • only has members that are from large self interest companies that are interested in closed loop recycling practices. This is good what they are doing be reuse of cartridges through refill companies still uses less transportation and power Example/ http://www.pcworld.com/article/id,141999/article.html • Participating EOLs and collectors need to sit down individually with OES to determine issues around fees. |
| <p>Question # 29: What is the most appropriate approach for structuring the governance of OES upon completion of the steward registration process?</p> <ul style="list-style-type: none"> • I believe that there should be a Federal Law that indicates what the norms & standards should be in the approach of recycling. That said, the provincial governments must meet or exceed. • Stewards from each sector should be represented on the board. • There should definitely be more diversity on the Board of Directors. This would ensure that all parties' interests are addressed. With current plan, there seems to be a lack of emphasis on reuse. • The most appropriate approach would be to direct appropriate efforts to getting Collectors/Consolidators registered quickly. Have a total of 5 to 10 registered within the first 3 months would be key to get the wheels in motion. Also have 5 to 7 Processors registered by the 3 months date as we need to get this process going can't be waiting around. You will need to set bylaws once we have collectors/consolidators & processors registered. You will need bylaws that will protect everyone & will not allow the improper disposal of any electronic equipment. maybe on each WEEE Product that needs to be recycled should have a tag (a security tag some where on the inside of the units so that it will track who has purchased it & we can track them down if improperly recycled the unit) that would help detour residential & industrial electronic dumping of equipment. It will force you as a customer to recycle anything that is NON BIODEGRADABLE in the environmentally friendly way. If not done so there will a recycling charge sent to the person & will have to paid kind of like a parking ticket but with more weighting on it list higher fines for multiple offenders of the Recycling Act. • Allow unbiased representation for existing Ontario processors and collectors on the membership board. • Other stakeholders need to be involved in the governance structure. |
| <p>Question # 30: Do you have other comments to make about governance and rules?</p> <ul style="list-style-type: none"> • We smaller fish are hoping to not be left out of the loop |
| <p>Question # 31: Do you have any other comments to make on any other component of the draft preliminary plan?</p> <ul style="list-style-type: none"> • I believe that there should be some representation from the recycling industry that helps draft the preliminary plan. • We strongly believe that the plan should adhere to a minimum percentage of not-for-profits in regards to becoming collectors. This concerted effort should be complied with to do the social benefits as well as being able to maximize the efficiency of the plan. • OES members are only large companies with possible bias being part of economic self interest groups. Can profit oriented organizations make decisions for the good of all rather than uphold there own interests? |

Appendix III

Waste Electrical and Electronic Equipment

Online Processor Survey

**Comments Received Through On-line Questionnaire
on February 11th Version of Draft Preliminary WEEE Program Plan**

Ontario Electronic Stewardship (OES) provided stewards and stakeholders with various options to submit comments on the February 11th version of the Draft Preliminary WEEE Program Plan. One of those options offered an opportunity for (EOL) end-of-life processors of electrical and electronic waste to participate in a processor webinar. The meeting was attended by more than 30 processors and featured a presentation by the OES team with a question and answer session that enabled all participants to ask questions and provide feedback on the [draft program plan](#).

The following attended the webinar.

ARTEX Environmental Corporation, John Neville

CARI, Bateman William

CAW Local 200 Computers For Kids, John McCloskey

CAW Local 200 Computers for Kids, Chris Davies

Computers for Kids, Carrie Schroeder

Dominion Business Machines, Jim Sanderson

Ecycle Solutions, Dave Betts

Electro-Shred Ltd, Stephen Bogler

Ewaste Management (Wozco Inc. Kitchener div), Don Leiobold

Global Electric Electronic Processing Inc., (GEEP) Wallace Mackay

Global Electric Electronic Processing Inc., (GEEP) Greg McWatt

Global Electric Electronic Processing Inc., (GEEP) Dave, Douglas

Greentec, Hugh, Hinrichs

Hughes, Mike, Processor

JJs Developments Electronic Recycling Services, Paul Dowling

KIMCO STEEL Sales, Bill Logan

MaSeR Canada, Dana Wright

MTC Service, David Barnes

OERRA /ADL Process Ltd. Mario D'Alfonso

OERRA /Computation, Dennis Maslo

Ontario Waste Management Association, Katie McDonald

Ontario Waste Management Association, Rob Cook

RBRC, Tyrone, Biljan

RCT, Jacqueline Harvey

RDlong Computers, Raymond Long

RDlong Computers, Randy Long

Rider Computer Services Ltd. Ecosys Canada Inc., Mary Pirrolas

Sims Recycling, Cindy Coutts

Target Recycling Services Inc., Paul Van Wyck

Toronto Recycling Inc., Jason Lim

Valu-Shred, Rick Zeller

Wozco Inc., Aaron Wozniak

dataXile, Joseph Bozic

The following submitted questions during the webinar:

Ontario Waste Management Association, Rob Cook

Sims Recycling, Cindy Coutts

OERRA/ADL Process Ltd. Mario D'Alfonso

JJs Developments Electronic Recycling Services, Paul Dowling

Ewaste Management, Don Leibold

Toronto Recycling Inc., Jason Lim

OERRA/Computation, Dennis Maslo

Target Recycling Services Inc., Paul Van Wyck

GEEP Global Electric Electronic Processing Inc., Wallace Mackay

Comments Received Through On-line Questionnaire on February 11th Version of Draft Preliminary WEEE Program Plan

| Comments/Frequency | | OES Response |
|------------------------------|---|---|
| Program Plan (1) | | |
| 1 | Given there is a collection and processing infrastructure in place, did OES do a detailed assessment of the impact on the existing system and existing collectors & processors relative to each of the three models identified? If yes, is this assessment available? | OES completed an initially assessment of broad options and general pros and cons of each option. Due to limited time and direction from the WDO, OES carried the preferred model through to developing detailed program collection, handling and processing targets, costs and standards. |
| Regulation 347/4 (1) | | |
| 1 | Will there be a new regulation for e-waste or will regulation 347 be sufficient? | WEEE is regulated by the Waste Diversion Act, 2002 – O. Reg. 393/04 and the Environmental Protection Act – R.R.O. 1990, Reg. 347 |
| Collection/Accessibility (3) | | |
| 1 | <i>Response to Webinar Question: Should the central region be split?</i> <ul style="list-style-type: none"> Regional collection territories what process will be implemented to secure regional collection. | A tender or RFP will be used to award collection contracts to transport WEEE from collection agents to consolidation centres. Transportation from consolidation centres to primary processors will be part of the Primary Processor RFP. |
| 2 | <i>Response to Webinar Question: Should the central region be split?</i> <ul style="list-style-type: none"> Yes the splitting would allow for more solutions. 6 months also allows for redistribution if there are problems with any processors keeping up to their requirements. Where does Kitchener/Waterloo fit in being between divisions? Is there a map showing the regions for processors knowledge? Six months is best for allowing new processors to join. | Appendix 6 lists the communities that are included in each region. |
| Processor/Collector (8) | | |
| 1 | There is no question that any processor must know that he has some consistent volume to improve efficiencies and drive down costs. Why did OES pick six months for bidding why not a year? | Revised allocation process in Section 5.6 outlines a process where bids will be on an 18 month basis. |

| Comments/Frequency | | OES Response |
|--------------------|---|---|
| 1 | <p>A six-month contract award will discourage any technology investment that would result in increased recycling rates, cost reductions, or investment in new capacity. Businesses compete for capital for new technologies and none of us would convince ourselves, boards or owners to invest with only a six-month commitment from OES. OES needs to consider the opposite end of the spectrum, as is more common in the industry today, to award three-year contracts. Otherwise it does not honour the Ministry requirement to minimize market distortions. Will OES consider implementing three-year processing contracts?</p> | <p>Revised allocation process in Section 5.6 outlines a process where bids will be on an 18 month basis.</p> |
| 1 | <p>What is the 'nexus' test?</p> <p>How was the cap of eight processors per bid lot arrived at?</p> <p>What has been/will be done to facilitate the participation of small and medium sized processors (eg. lower capacity processors)?</p> <p>How can reuse be better integrated into the flow, both before and after the consolidation points?</p> <p>How is reuse considered as part of the processor environmental criteria?</p> <p>While the few large firms may require long term contracts to gauge investments, SME and new entrants require market access for the same. No one can know in advance where innovation and efficiency will come from.</p> | <p>Nexus is a term used to assess if the fees proposed by an IFO are legal under the WDA. The test is whether the fees are associated with the provision of service.</p> <p>The revised allocation process outlines different caps for each region based on a reasonable volume of material being handled over an 18 month period.</p> <p>The revised allocation process is intended, in part, to provide greater accessibility and potential for small and medium EOL processors that meet the Electronic Recycling Standard to fairly and competitively bid to potentially receive a share of the collected WEEE.</p> <p>Reuse is not a criterion for the EOL processors.</p> |

| Comments/Frequency | | OES Response |
|-----------------------------|---|--|
| Allocation Model (3) | | |
| 1 | What concerns has OES responded to in arriving at this Allocation Model? What does this allocation model accomplish by way of accessibility, recycling rate, capture rate, re-use, and by way of Infrastructure development? | <p>OES responded to concerns raised during the January draft that the allocation of collected WEEE had the appearance of being closed and non-transparent. Concerns were raised whether OES board members were in conflict in making these decisions because of existing or future contracts or relationships with processors.</p> <p>Therefore OES agreed to revise the approach and more to the allocation bid model that would provide transparency and accountability. OES believe the new approach provides greater opportunities for existing processors who meet the standard to competitively bid for projected quantities of WEEE coming out through the program.</p> |
| 2 | <p>Reuse seems to be a key element of the program. Question is how and where the collected WEEE will be separated into for processing and for reuse?</p> <p>If the processor will be allowed to divert WEEE for reuse, when will the regional consolidation locations be available?</p> | Section 5.2.5 The meeting held on the revised allocation approach was for EOL WEEE only. |

Participants were encouraged to use an on-line “comment form” that highlighted the key issues of importance to processors. The option to use the form was included in an OES newsletter which was distributed to all processors on the OES mailing list on Tuesday, February 19th following the Monday, February 18th processor webinar meeting.

OES received a total of five completed on-line survey forms. An additional form was submitted but was incomplete/blank. The individual/company that submitted the blank form was contacted to determine if the intention had been to submit comments using the on-line format and, for some reason, the comments did not register. The outcome of this has yielded no additional survey responses.

The following submitted comments through this mechanism:

36ZeroWaste Group Inc, Monica Danon Schaffer

ARTEX Environmental Corporation, Ross Geiger
eCycle Solutions, David Betts

GEEP, Wallace Mackay

Sims Recycling Solutions, Cindy Coutts

Comments Received Through On-line Survey on February 11th Version of Draft Preliminary WEEE Program Plan

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|--|
| Question # 1: Do you agree with the evaluation criteria as outlined? |
| Yes Answers: 1 |
| <i>Please explain your position:</i> No explanation provided. |
| No Answers: 3 |
| <i>Please explain your position:</i> <ul style="list-style-type: none"> • Not sure at this point but the percentages seem a bit weird. • Firstly, recycling performance can be judged on more than the percent of WEEE recycled versus disposed. For example, safety, industrial hygiene, R&D expenditures, process efficiency gains, and staff turnover are equally as important. How will OES distinguish between a processor within a short distance (i.e. a maximum of an additional 9% points) versus a processor located at greater distance? The economies of scale and the cost of the environmental and industrial hygiene programs may only support one central facility. It is feasible, in this case, that the bulk of the volume could be awarded to a local facility that does not have the same environmental or industrial hygiene performance as a further more advanced processor. This does not reward companies that choose to operate above the recycling standards in an effort of continuous improvement, nor does it encourage further investment. Distance to processor, while an indicator of the carbon impact of transportation, needs to be gauged against other criteria than simply percentage of WEEE recycled versus disposed. The percentage of WEEE recycled needs to include a plastics to energy solutions as outlined in our previous set of comments. Plastics to energy includes any form of conversion of plastics for its BTU value, either directly, or through an intermediary energy product such as diesel. |
| Question # 2: Do you agree with the weightings as outlined? |
| Yes Answers: 1 |
| <i>Please explain your position:</i> No explanation provided. |
| No Answers: 4 |
| <i>Please explain your position:</i> <ul style="list-style-type: none"> • See comments above. • If I understand the evaluation process correctly, I'm assuming this criteria will apply for each "lot" of feedstock being posted. Not sure why you would need this depth of criteria, when the vendors have already been approved to process e-waste. It would seem to me that cost and distance from Consolidation Centre would be the only 2 criteria that should be used. However if you choose to use this criteria for each bid, we support the focus on "true" recyclers and the environment which appears to be inherent. We do think that greater weighting should be given to the recycler performance and processing diversity criteria vs. available processing capacity. Vendors who don't have capacity available should not be able to bid. With this criteria, we would suggest eliminating the 20% capacity weighting all together. We are assuming that capacity measure is for those processors who have plants in Ontario only...companies who have processing capability in other provinces/US could have unfair advantage. As an approved processor, we would be concerned about creating an "overcapacity" in the marketplace. Our company has invested significant capital into our plant and we have a plan for the processing of 18,000 tons per year. With 4-5 vendors approved, then we would expect that over the year an approved processor would get enough feedstock to sustain themselves. • The largest criterion is % recycled vs. disposed and my question is how this will be assessed. For example my company has invested significant time in money in developing technology that has minimal impact on the environment. When evaluating processes that employ smelting will you consider what comes out the smoke stack and or what is discharged into the tailing fields and then landfill. If you don't do this then you are not making a fair comparison to companies that in fact don't smelt. Why include price in the criteria why not these as separate criteria have? Including price as part of the overall |

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| <p>criteria makes it less important when in fact it should be a major consideration on its own. Lets free enterprise.</p> <ul style="list-style-type: none"> • Firstly, recycling performance can be judged on more than the percent of WEEE recycled versus disposed. For example, safety, industrial hygiene, R&D expenditures, process efficiency gains, and staff turnover are equally as important. How will OES distinguish between a processor within a short distance (i.e. a maximum of an additional 9% points) versus a processor located at greater distance? The economies of scale and the cost of the environmental and industrial hygiene programs may only support one central facility. It is feasible, in this case, that the bulk of the volume could be awarded to a local facility that does not have the same environmental or industrial hygiene performance as a further more advanced processor. This does not reward companies that choose to operate above the recycling standards in an effort of continuous improvement, nor does it encourage further investment. Distance to processor, while an indicator of the carbon impact of transportation, needs to be gauged against other criteria than simply percentage of WEEE recycled versus disposed. The percentage of WEEE recycled needs to include plastics to energy solutions as outlined in our previous set of comments. Plastics to energy includes any form of conversion of plastics for its BTU value, either directly, or through an intermediary energy product such as diesel. |
| <p>Question #3: Do you agree with the proposed allocation of available tonnage of WEEE as outlined?</p> |
| <p>Yes Answers: 1</p> |
| <p><i>Please explain:</i> No explanation provided</p> |
| <p>No Answers: 3</p> |
| <p><i>Please explain:</i></p> <ul style="list-style-type: none"> • We believe that the government needs to ensure that the approved vendors have adequate time to establish sustainable feedstock to establish their business from the process over a reasonable period of time. Our company has invested 2+ years in building our infrastructure and process to meet the important demands of the E waste stream. By introducing new processing vendors into the process, potentially every 6 months, our business will be impacted. We believe that in an environment where the government is going to control capacity processing in Ontario, approved processors from the first phase should be given a 2 year award for this capacity to sustain the significant investment they have made to this important marketplace. In addition, we also believe that the minimum amount of feedstock for an approved processor should be 20% of the entire stream from Ontario. • Suggestion 1: Contracts of up to 3 years should be considered, especially in those regions currently underserved by processors. We believe a 6 month bid process leaves too much workflow uncertainty to justify capital investment and to build capacity. • Suggestion 2: There should be fewer than 8 qualified recyclers, especially in the smaller regions, which would allow for higher percentages of waste to be allocated to each processor. In a small region with 8 bidders you could drop from 30% allocation to 10% allocation simply by ending up a few points lower than the competition. We suggest an allocation more along the following lines: Maximum of 3-4 bidders. First ranked receives 40%, second 35%, third 25%. Coupled with longer bid periods, this would justify the necessary investments. We suggest a similar approach for the larger GTA region where, under the current formula, if there are three bidders the allocation would be 65/25/10. An allocation of 40/35/25 would allow all to compete without the risk of such a dramatic fall in volumes. • I think that perhaps there should be a more graduated % because in the situation where there are eight qualified bidders there is not much difference between number 2 and number 8. • Question: If in the above scenario if we were bidder number 8 and we bid \$.50 and number 2 bidder bid \$.30 would we still get our \$.50? • The proposed allocation of WEEE volumes is an indication of micro management at its worst. In practicality, it is going to be very hard for OES to manage this allocation. What if a facility has a strike or fire – are they still guaranteed their allocation? Like other provinces, OES needs to consider a few recyclers to meet the needs of the program and to minimize bid analysis and relationship management. |
| <p>Question # 4: Assuming that your company is qualified as a processor under the program, would your company bid to provide processing services under the program as outlined?</p> |
| <p>Yes Answers: 3</p> |
| <p><i>Please explain your position:</i></p> <ul style="list-style-type: none"> • We are an e-waste processor and have been for 8 years, yes we would bid on the processing but it would be nice to see some clarification. |

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| <p>No Answers: 2</p> <p><i>Please explain your position:</i></p> <ul style="list-style-type: none"> No response at this time pending feedback on our first item above. Not for a 6 month contract. A 6 month contract award will discourage any technology investment that would result in increased recycling rates, cost reductions, or investment in new capacity. Businesses compete for capital for new technologies and none of us would convince ourselves, boards or owners to invest with only a 6 month commitment from OES. OES needs to consider the opposite end of the spectrum, as is more common in the industry today, to award 3 year contracts. Otherwise it does not honour the Ministry requirement to minimize market interventions. |
| <p>Question # 5: Is there a minimum tonnage per regional bid lot that is required for you to bid?</p> |
| <p>Yes Answers:</p> <p><i>Please explain your position:</i> No explanation provided.</p> |
| <p>No Answers: 4</p> <p><i>Please explain your position:</i></p> <ul style="list-style-type: none"> No, but we need at minimum 9000 tons per year to sustain our business. No response at this time. However, Sims will not be bidding unless awarded contracts are significantly longer than 6 months. |
| <p>Question #6: Do you agree that the proposed approach treats all potential processors in the market fairly?</p> |
| <p>Yes Answers: 2</p> <p><i>Please explain your position:</i></p> <ul style="list-style-type: none"> Somewhat, although a processor who has a significant stream of business today could undercut all other bidders (approved processors) because of existing critical mass. To ensure this does not happen we would encourage the minimum of 10% be increased to 20% for at least Year 1. |
| <p>No Answers: 4</p> <ul style="list-style-type: none"> No, our issue #1 above related to the requirement to have existing facilities destined to handle electronics waste. Companies active in other provinces who have been approved under the RVQP process should not have to invest in facilities or undertake mergers/acquisitions in order to be considered qualified processor. The term should be longer to encourage people to invest in technology to improve efficiencies. Even people wanting to get into this market will not waste their time if they can only secure 6 month contracts. There are examples in this plan favouring small enterprises and reuse organizations. Sims fully supports reuse of WEEE (we are in this sector of the business in a significant way). However, we do not support the proposed plan to allow reusers to “cherry pick” valuable resources from unsellable WEEE prior to having OES deal with the bulk remainder. We also do not agree that processors should have to take this “cherry picked” unsellable reuse portion at the same price as intact WEEE. Large organizations that have invested heavily in WEEE processing technology and capacity should be rewarded and encouraged through this plan. Ontario will need the support of large WEEE processors given the estimated WEEE generation volumes. Large WEEE processors will have no interest in bidding on 6 month contracts as we cannot train and retain qualified staff and invest in new technologies or capacities without a certain guarantee of material flow. With the current allocation proposal, a company could see swings in volume every 6 months which will not lead to a stable, sustainable, with the ability to improve WEEE processing capacity in Ontario. |
| <p>Question #7: Should bidding be undertaken by quantities?</p> |
| <p>Yes Answers: 1</p> <p><i>Please explain why/why not</i></p> <ul style="list-style-type: none"> Yes, wherever possible. |
| <p>No Answers: 1</p> |

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| <p><i>Please explain why/why not:</i></p> <ul style="list-style-type: none"> I think it should be undertaken by those outfits that demonstrate due diligence, not just an attempt to make a quick dollar. |
| <p>Question # 8: Should bidding be undertaken by stream?</p> |
| <p>Yes Answers: 1</p> |
| <p><i>Please explain why/why not:</i></p> <ul style="list-style-type: none"> The key for us is whether the e-waste stream is identified by component % in the bid lot....given that we have different costs for monitors/TV's vs. the rest of the stream. As long as the material is identified (%weighting) of each waste stream, our company can bid accordingly. |
| <p>No Answers: 4</p> |
| <p><i>Please explain why/why not:</i></p> <ul style="list-style-type: none"> Not clear which 3 streams of WEEE you mean? If you are referring to different RFP's, legal contracts etc for each of the three streams, we believe this would be too cumbersome. If there will be a single RFP process where the commodity pricing is broken down into the two categories of CRT and non CRT pricing then this could be a workable option. Consideration should also be given to addressing the additional costs of recycling material received from reuse centers where the valuable recyclable material may have been removed. No, a recycler should only qualify if he takes the good with the bad. Many processors will not take monitors because there are no valuable commodities and it is a cost to process because it is largely a manual process. You must be able to process the good with the bad to help offset some costs. If you allow separate bidding your costs will increase. There is no need to separate the materials according to the proposal into 3 separate groupings: Desktop and laptop computers Display devices, Printing devices and peripherals" Efficient recyclers handle all of these products and do not need to receive them in a segregated manner. Segregation adds handling costs to the program. In addition, unit count for every unit adds unnecessary costs. Unit count can be estimated by the recyclers based on statistically significant sampling and estimates based on weight. |
| <p>Question # 9: Should 'distance' be removed in favour of price quote that is FOB consolidation?</p> |
| <p>Yes Answers: 3</p> |
| <p><i>Please explain why/why not:</i></p> <ul style="list-style-type: none"> It could unfairly bias a bidder if they are out of province. I think it would drive competition and improve overall pricing. |
| <p>No Answers: 1</p> |
| <p><i>Please explain why/why not:</i></p> <ul style="list-style-type: none"> It will be very difficult to compare the cost of recycling from one processor to another if the bid includes freight. Given the stringent recycling standards (which we support) it is important that the processors compete on their recycling abilities and that OES be able to evaluate the recyclers based on this, rather than freight. |
| <p>Question # 10: Should the Central Region be split?</p> |
| <p>Yes Answers: 2</p> |
| <p><i>Please explain why/why not:</i></p> <ul style="list-style-type: none"> Perhaps. To bring in line with the amounts that are estimated from the other regions – might make it a more level playing field and allow other bidders to enter the process. Maybe split into 4 areas. Yes and No. It would drive more competition, allow more access to all processors but it would increase program costs. |
| <p>No Answers: 3</p> |

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|---|----------------------------|
| <p><i>Please explain why/why not:</i></p> <ul style="list-style-type: none"> • Doesn't matter, although given the large forecasted e-waste generation from this area, it may makes sense to split up into 2 quantities. • No. It is unclear what the benefits would be to taking this step. The Central Region, because of the size, could perhaps have up to 5 processors while the other regions perhaps 3. • No. It is already unclear as to the rationale for dividing the province into 4 regions, as other than distance to the recycler this has no relevance to the recyclers ability to process volumes in the most environmentally and economically sound manner. As the plan was originally drafted processors will have to prepare bids for 4 regions. Creating even smaller regions simply exacerbates the problem. No other province has divided their territory into regions for bidding and processing. Doing so creates artificial boundaries that interfere with fair and open market bidding and competition. | |
| <p>Question # 11: Are the proposed calculations appropriate?</p> | |
| <p>Yes Answers: 1</p> | <p>No Answers:1</p> |
| <ul style="list-style-type: none"> • With the information presented, it would appear so. Could change if more data is made available | |
| <p>Question # 12 Should this material allocation approach be used for Phase 2 WEEE?</p> | |
| <p>Yes Answers: 1</p> | |
| <p><i>Please explain why/why not:</i> No explanation provided.</p> | |
| <p>No Answers: 3</p> | |
| <p><i>Please explain why/why not:</i></p> <ul style="list-style-type: none"> • Not sure what the Phase 2 of WEEE entails. • No, see above on minimum requirements of 20% for approved vendor. • The same allocation should be used for both phases. • It would be prudent to modify the Plan based on our feedback and the feedback of others. After the implementation of Phase I, a review of the program should occur in order to assess it's applicability to Phase II materials. | |
| <p>Question #13 Do you have any other comments?</p> | |
| <ul style="list-style-type: none"> • Yes. Would like to know what monies you will allocate for research of how to remove BFRs from WEEE plastics and eligibility to apply for funds. Does one have to be up and running for a certain period of time before applying for funds? Might this be part of the proposal package submitted from the beginning? | |

Appendix IV

Waste Electrical and Electronic Equipment

WDO Consultation Plan to Support the Development of a Diversion Program for Waste Electrical and Electronic Equipment



Waste Electrical and Electronic Equipment

***WDO Consultation Plan to Support the Development
of a Diversion Program for Waste Electrical and
Electronic Equipment***

January 14, 2008

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1.0 Background

Waste Diversion Ontario (WDO) is a non-crown corporation created under the Waste Diversion Act (WDA) on June 27, 2002. WDO was established to develop, implement and operate waste diversion programs for a wide range of materials. To date, the Minister has requested diversion programs for Blue Box Wastes, Used Tires, Used Oil Material, Waste Electrical and Electronic Equipment (WEEE) and Municipal Hazardous or Special Waste (MHSW).

The WDA empowers the Minister to designate a material for which a waste diversion program is to be established. Once the Minister has designated a material through a regulation under the WDA, the Minister directs WDO to develop a diversion program. WDO is required by the Act to develop a waste diversion plan for the designated waste in co-operation with an Industry Funding Organization. Waste Diversion Ontario is further required by the Act to conduct public consultation on any matter referred to it by the Minister.

On December 20, 2004 the Minister filed a regulation under the WDA designating WEEE. On, June 11, 2007 the WDO Board of Directors received a Final Program Request Letter from the Minister of the Environment requesting a diversion program for WEEE. The Minister's letter outlined program requirements and requested a consultation plan.

2.0 Objectives and Scope

Waste Diversion Ontario will develop and implement a consultation process that will result in a consultation process that is thorough and will ensure a beneficial exchange of information, ideas and opinions among those who may be affected by the development and implementation of a diversion program for WEEE.

A number of parties are considered to be stakeholders in this process, including the stewards which include electrical and electronic equipment (EEE) brand owners, first importers and/or assemblers of non-branded products for sale and use in Ontario that result in WEEE, as well as the industry associations that support their work. Additional interested stakeholders include affected industries; municipalities; environmental and community groups with a particular interest in waste management, water quality and public health issues related to the life cycle of EEE; industrial, commercial and institutional generators of WEEE; professionals working in related fields (e.g. environmental consultants; and the general public).

The Addendum to the Minister's Program Request Letter prescribed the obligated WEEE for Phase 1 and Phase 2, and made reference to future phases of the program. Stewards of materials obligated under Phase 1, Phase 2, and future phases, as well as stakeholders interested in these materials will be encouraged to participate in the consultation process for the development of a diversion program for Phase 1 Consultation Plan to support the development of the Waste Electrical and Electronic Equipment diversion plan.

Within one year after the Minister approves Phase 1 of the program, a proposal for Phase 2 is to be submitted to the Minister.

The Phase 1 and Phase 2 materials identified in the Minister's Program Request Letter do not represent the full range of WEEE materials in Ontario Regulation 393/04. The Minister may direct WDO to include additional WEEE materials in future phases of a WEEE program.

The Program Request Letter required that WDO designate an Industry Funding Organization (IFO) for WEEE. On September 20, 2007, Ontario Electronic Stewardship (OES) was incorporated, and approved by WDO as the IFO for WEEE on October 17, 2007. OES is responsible for implementing this consultation plan and managing the development and implementation of the WEEE diversion plan, in co-operation with WDO.

While this consultation plan is being implemented, the plan development process will also include:

- Periodic review of information arising from the consultation process and related to WEEE plan development by the OES Board and those WEEE stewards directly involved with OES in plan development;
- Periodic review of information arising from the consultation process and related to WEEE plan development by the WDO Executive Director and WDO Board; and
- Periodic meetings among WDO staff, OES and Ministry of the Environment staff and legal counsel.

3.0 Key Participants in Consultation

The consultation process will be targeted at five key audiences:

3.1 Industry Stewards

Stewards

This group refers to EEE brand owners, first importers and/or assemblers of non-branded products supplied in Ontario that result in WEEE, who will be registering with the IFO (or implementing their own Industry Stewardship Plan as allowed under the Act) upon approval of the WEEE Program Plan.

Industry and Trade Associations

Industry and trade associations may assist in the identification and notification of individual company representatives, their members. These associations include but are not limited to:

- Electronics Product Stewardship Canada (EPSC)
- Information Technology Association of Canada (ITAC)
- Retail Council of Canada (RCC)
- Canadian Council of Grocery Distributors (CCGD)
- Electro Federation Canada (EFC)
- Medical Imaging and Information Systems Council (MIISC)
- Information Technology Association of Canada
- Canadian Wireless Telecommunications Association
- Entertainment Software Association of Canada
- Association of Home Appliance Manufacturers
- Electro-Federation Canada
- Canadian Welding Association

- Canadian Standards Association
- Canadian Toy Association
- Canadian Hardware & Housewares Manufacturers Association
- Heating, Refrigeration and Air Conditioning Institute of Canada
- Industry Canada
- Canadian Chinese Computer Association
- National Association for Information Destruction (NAID) – Canada
- Canadian Standards Association
- Canadian Security Association

3.2 Affected Industries

Representatives of other industries that may be affected by the development and implementation of a diversion program for WEEE include:

- distributors of products that may result in WEEE
- companies providing repair services for Electrical and Electronic equipment
- retailers of products that may result in WEEE
- assemblers of EEE
- generators of WEEE (as defined in Ontario Regulation 347)
- private companies providing collection of WEEE
- transporters of WEEE
- end markets for processed WEEE
- reusers of WEEE
- refurbishers, resellers and redistributors of WEEE
- processors and recyclers of WEEE
- operators of disposal facilities for WEEE
- professionals working in related fields

Industry associations representing these affected industries will be included in the consultation process. These associations include:

- Canadian Association of Recycling Industries
- Ontario Waste Management Association
- Ontario Environmental Industries Association

3.3 Municipalities

Some municipalities currently operate permanent WEEE depots or provide special WEEE events while other municipalities do not provide this service. Consultation with both types of municipalities will be important in developing an understanding of the role of municipalities in the delivery of a WEEE program. Municipalities or representatives of municipalities include:

- *Association of Municipalities of Ontario (AMO)*
- *Rural Ontario Municipal Association (ROMA)*
- *Federation of Northern Ontario Municipalities (FNOM)*
- *City of Toronto*⁴

⁴ City of Toronto is not a member of AMO

- *Association of Municipal Recycling Co-ordinators (AMRC)* - Recycling services offered by Ontario municipalities are typically managed by recycling co-ordinators. These recycling co-ordinators are responsible for municipally operated MHSW collection systems.
- *Municipal Waste Integration Network (MWIN)* - Municipal recycling co-ordinators also receive information through MWIN.

3.4 General Public

Residents of Ontario are consumers of electrical and electronic equipment, either individually or through their place of business, and have a direct interest in the development of a diversion program for these products.

There are two elements of the general public: those members of the public who are already engaged in the issue, either through direct involvement in WEEE management or other waste management issues; and those members of the public who have no awareness of the challenges involved with end of life management of Electrical and Electronic equipment.

It is important to engage members of the public in the process of designing a provincial plan to ensure the effective and environmentally sound management of WEEE. This will include environmental and consumer groups with a strong interest in waste diversion, issues related to public health that may concern the life-cycle of EEE, water quality, and environmental policy. The organizations include:

- Recycling Council of Ontario (RCO)
- Consumer Association of Canada - National office
- Canadian Institute for Environmental Law and Policy (CIELAP)
- Environmental Law Students Association (ELSA)
- Ecojustice
- Clean Air Foundation
- Citizen's Network on Waste Management
- Ministry of the Environment
- Pollution Probe
- Canadian Security Association
- Ontario Society for Environmental Education
- Sustainability Network
- The Ontario Environment Network
- Sierra Club Canada
- Toronto Environmental Alliance

It is also important to educate members of the public who are not aware of the end-of-life WEEE management implications, and provide them with information about diversion program plan development and the consultation process.

The consultation process will recognize the particular challenges of reaching members of the public who reside in northern and remote communities through use of local media and the ability for participation in workshops via webcast.

4.0 General Elements of Consultation

The consultation process will contain the following elements:

4.1 WDO Website

The WDO website will be used to outline the consultation process and schedule, post consultation documents for comment and receive comments from industry, municipalities and the general public.

4.2 IFO Website

It is anticipated that the existing Ontario Electronic Stewardship website will be dedicated to WEEE program development. The website will be used to outline the consultation process and schedule, post consultation documents for comment and receive comments from industry, municipalities and the general public.

4.3 Database of Identified Stakeholders

An inventory of identified stakeholders will be created in database format that will form the core of consultation activities.

4.4 Electronic Notice to Identified Stakeholders

Electronic notices outlining the consultation process, schedule and key dates for meetings and comments will be distributed to identified stakeholders.

4.5 Consultation Paper

Stakeholder consultations that involve technical or economic complexities are best anchored in a background paper that is regularly updated throughout the process to reflect the state of consultation. The consultation paper will be available on the websites.

4.6 Consultation Workshops/Webcasts

Issues will be presented to stakeholders at a number of workshops that will be simultaneously webcast. Questions and comments will be solicited from meeting and webcast participants during the event. Information presented at workshops and questions asked by participants will be available via archived webcasts for 90 days.

Workshop/Webcast # 1 -

- Waste Diversion Act
- Waste Diversion Ontario
- Regulation Designating WEEE
- Final Program Request Letter
- Revisions to Consultation Plan
- Q&A on all topics

Comments were requested on the draft consultation plan and the governance proposal. Comments received following Workshop/Webcast # 1 were considered when finalizing the consultation plan.

Workshop/Webcast # 2 -

- Definition of Obligated Materials
- Designated Stewards
- Phase 1 Preliminary Projections
- Current WEEE Diversion Activity
- Collection and Diversion Options
- Recycling Vendor Qualification Requirements
- Key Program Elements
- Consultation Process
- Q&A on all topics
- Processor Meeting
- Collector Meeting

Comments were requested on the baseline data and plan options. Comments received following Workshop/Webcast # 2 were considered when preparing the draft preliminary program plan.

Posting Draft Preliminary Program Plan

Following Workshop/Webcast # 2, Ontario Electronic Stewardship will post a draft preliminary WEEE diversion program plan on its website. (This plan was posted on January 14, 2008.) Within 15 days of publication of the proposed plan, Ontario Electronic Stewardship will hold Workshop # 3 (with access via webcast) to explain its proposed program plan to stakeholders and for interested stakeholders and members of the public to provide comment. Workshop #3 is being held on January 24, 2008.

Workshop/Webcast # 3 – Draft Preliminary Program Plan

- Draft diversion program plan for WEEE
- Issues raised during consultation and how they were addressed in the diversion program plan
- Process to submit comments on the draft preliminary plan
- Plan budget
- Setting stewards' fees
- How to prepare to meet obligations

Comments will be requested on the draft preliminary plan within 10 days of Workshop/Webcast # 3. (Comments will be due by end of day February 4, 2008.) Comments received will be considered when preparing the draft final program plan.

4.7 Plan Submission and Explanation of Results

Ontario Electronic Stewardship will consider all comments received from stakeholders and will amend its draft preliminary WEEE program plan as appropriate based upon the comments. The draft preliminary plan will include responses to significant comments received during the consultation process, regardless of whether the comments were incorporated into the draft preliminary program plan.

Ontario Electronic Stewardship will submit the draft preliminary program plan to WDO for review, post the draft preliminary program plan on its website and provide notice to all stakeholders regarding the posting. The WDO will also post the draft preliminary program plan on its website.

4.8 Comments to WDO

Once the draft preliminary program plan has been submitted to WDO, affected stakeholders and members of the public may submit comments on the draft preliminary plan directly to WDO if they believe that the plan does not adequately take into account comments submitted during the consultation process. WDO will consider any such comments when it is evaluating whether to request that Ontario Electronic Stewardship modify the program plan or to approve the plan and forward it to the Minister for final review and approval.

5.0 Consultation with Industry Stewards

In addition to the general elements listed above, the consultation process with industry stewards will contain the following elements:

- *Press Release to Industry Associations:* A media release will be distributed to industry associations' newsletters to inform their members of the consultation process and schedule.
- *Press Release to Ontario and National Business Media:* A media release outlining the consultation process and schedule, with a special focus on workshops and webcasts, will be distributed to appropriate communications opportunities so that the workshops will be listed in "Coming Events" and the webcasts will be listed in "New Websites" columns.

6.0 Consultation with Affected Industries

Affected industries will be encouraged to participate in the consultation process outlined in Section 4. In the event that the three workshops provide inadequate time to deal with sectoral issues arising from the affected industries, additional working groups will be formed to address any specific issues that cannot be covered through direct submissions.

7.0 Consultation with Municipalities

In addition to the general elements listed in Section 4, the consultation process with municipalities will contain the following elements:

- *Websites:* AMO, AMRC, MWIN and RCO will be requested to post information on their websites. Materials will include contact persons for further information.
- *Notices to Municipalities:* Municipalities will be notified directly that materials are available via the websites.

Municipal issues raised during the workshops/webcasts will be addressed through discussions with representatives from affected municipalities and/or with representatives from the Association of Municipalities, City of Toronto (which is no longer a member of

AMO), Rural Ontario Municipal Association and Federation of Northern Ontario Municipalities.

8.0 Consultation with General Public

In addition to the general elements listed in Section 4, the consultation process with the general public will contain the following elements:

- Preparation of Background Information Paper: Members of the public will likely require background information in preparation for informed participation in the consultation process. The paper will contain information on the Waste Diversion Act, Waste Diversion Ontario, the Minister's letter requesting a diversion program for WEEE the environmental benefits of designating WEEE, a description of the consultation process and contact information. The information will be available in both print and electronic format. Print copies will be provided by WDO and OES upon request. An electronic copy will be posted on the WDO and OES websites.
- Websites: The availability of the background information package and details regarding the development of the program plan will be posted on the WDO and partnering websites.
- Press Release: A press release will be issued to notify the public of the availability of the background information package via the websites.
- Media Kit: A media information kit will be prepared for publishers, broadcasters and environmental columnists that outlines the benefits of an WEEE program.
- Guest Columns: Draft guest columns and open letters to the editors will be provided to Ontario community newspapers in order to reach the general public with information on the WEEE program and opportunities to participate in the consultation process.
- Notices to Identified Community Interest Groups: Identified interest groups will be notified directly that materials are available via the websites. These groups include:
 - Canadian Institute for Environmental Law and Policy
 - Citizen's Network on Waste Management
 - Clean Air Foundation
 - Consumers' Association of Canada
 - Environmental Educators of Ontario
 - Ontario Environment Network
 - Pollution Probe
 - Recycling Council of Ontario
 - Sierra Club of Canada
 - Sustainability Network
 - Toronto Environmental Alliance

9.0 URL Links to Archives of Workshop/Webcasts

Workshop/Webcast # 1: Archive:

<http://www.wdo.ca/content/?path=page80+item126047>

Workshop/Webcast # 2: Archive:

http://www.ontarioelectronicstewardship.ca/consult_workshop2.html