

***Recycle My Cell - Recycle mon cell***

**CWTA Stewardship Plan for the Recycling of Cellular Phones  
in the Province of Ontario**

**As Submitted for WDO Board of Directors Review  
January 25, 2010**

**Based Upon the CWTA National Cellular Phone Recycling Program**

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## **1. Introduction**

The Canadian wireless telecommunications industry, under the auspices of the Canadian Wireless Telecommunications Association's (CWTA) Recycling Committee, has developed Recycle My Cell (RMC), a national cellular phone recycling program. CWTA is the authority on wireless telecommunications issues in Canada and has extensive experience in managing several industry-wide initiatives including, for example, the introduction of Wireless Number Portability. The members of CWTA include, among others, wireless service providers, wireless handset manufacturers and recyclers.

The national cellular phone recycling program has been developed to meet the requirements of Ontario as well as the requirements of other provinces. Specific to Ontario, the program meets the criteria identified in the *Waste Diversion Act (WDA)* and the *Waste Electrical and Electronic Equipment Regulations (WEEE)*, as they pertain to the development and approval of an Industry Stewardship Plan (ISP).

Recycle My Cell leverages existing programs operated by wireless service providers and handset manufacturers, which will accommodate the requirements of the provincial legislation and regulation. These corporate programs collect, transport, reuse and recycle mobile devices and accessories. Where no other option exists these programs properly dispose of the products.

CWTA, acting as the ISP proponent, will manage the program on behalf of the industry, acting as a single point of contact for consumers, the provinces, municipalities and other stakeholders. It will also be responsible for any joint administrative requirements such as consumer education and complying with provincial reporting.

### **1.1 Executive Summary**

Recycle My Cell is an established, free, national cellular phone recycling program with the objective of maximizing the useful life of designated wireless material while minimizing the introduction of mobile devices into the municipal waste stream.

The following brands are currently covered by Recycle My Cell: Aliant; Bell; Fido; Koodo Mobile; MiKE; Motorola; MTS; Nokia; Research In Motion; Rogers Wireless; Samsung; SaskTel; SOLO; Sony Ericsson; TBayTel; TELUS; Videotron and Virgin Mobile Canada.

Recycle My Cell, which already operates voluntarily, will officially launch in Ontario upon approval and will continue indefinitely. It will be carried out without charge to consumers as long as it is economically viable to do so. To date, the program has received regulatory approval from the provinces of Nova Scotia (October 2008) and British Columbia (November 2009). Recycle My Cell has also been formally recognized by the provinces of Prince Edward Island and New Brunswick (March 2009), Manitoba (April 2009), Newfoundland and Labrador (July 2009), and Saskatchewan (November 2009) as the official cellular phone stewardship program within the province.

The program accepts mobile devices that were primarily designed to connect to cellular or paging networks, regardless of brand, model, origin or age. The devices include: cellular phones, wireless smartphones, cellular PDAs, pagers, and aircards, as well as certain accessories.

There are currently more than 970 drop-off locations in 126 communities across the province of Ontario. The vast majority of Ontarians, more than 80%, live within 15 km of a collection point. As an additional benefit to consumers, a variety of postage-paid mail-back options that accept any cellular phone are in place.

Along with paid advertisements, public service announcements and other promotional material, a Web site has been developed ([www.recyclemycell.ca](http://www.recyclemycell.ca) and [www.recyclemoncell.ca](http://www.recyclemoncell.ca)) to promote consumer awareness of recycling opportunities, act as a reference guide for the program and provide an up-to-date list of collection sites. Also, a toll-free phone number (1-888-797-1940) is available to complement the Web site for those without internet access.

Responsible aggregating, sorting, recycling and refurbishment will take place with the assistance of processing partners, including: *FCM Recycling, Global Electric Electronic Processing Inc., GREENTEC, ReCellular, Inc., and Sims Recycling Solutions.*

A donation to participating charities is made for each device returned through the various carriers' recycling programs. Some of the charities benefiting from the recycling programs include the World Wildlife Fund, Tree Canada and Food Banks Canada and its local agencies across the country.

CWTA has established realistic and achievable targets for several performance indicators that can be used to gauge the performance of the Recycle My Cell ISP:

- CWTA expects to see a **collection rate** of 22% in 2010 (of devices identified by CWTA as being available for collection in Table 1) and commits to working toward increasing the collection rate to 39% by 2014.
- CWTA expects to increase **awareness** of cell phone recycling nationally to 60% by November 2010 and to 80% by 2015. Awareness of Recycle My Cell will be increased to 10% nationally by 2015.
- CWTA expects to see a 1% increase in **participation and accessibility** each year until 2014. This will translate into 1,026 drop-off locations across Ontario.
- In terms of **diversion**, CWTA proposes that the program maintains the current diversion level from landfill of 100% for products that meet reuse criteria and maintains the current level of recycling, reclamation and recovery of 96% for wireless products entering the recycling process.
- CWTA expects to see 100% **customer satisfaction** with the Recycle My Cell program.

CWTA submits that the carrier subscriber data and the *churn* statistics used in the development of program targets are currently the best available data to model collection

targets. That being said, CWTA commits to working with the manufacturers and carriers to obtain better handset sales information.

Annually, CWTA will report on the total number of devices collected through drop-off sites and will provide a detailed estimate for the number of mailed-in devices originating from Ontario. In addition, CWTA will report on the performance indicators noted above, and described in more detail in Section 2.15.2, using quantitative and/or qualitative data gathered through the use of yearly surveys conducted to gauge the awareness and knowledge of the Ontario population concerning cellular phone recycling. These reported values will provide the basis for the year-to-year re-evaluation of targets set for this program.

CWTA fully supports the concept of Multiple Program Management with respect to cooperative and complementary recycling programs for end-of-life cell phones and related products in Ontario. CWTA looks forward to coordinating and cooperating with other program managers, as appropriate, in areas such as promotion, consumer awareness and data sharing.

CWTA understands that as per the existing regulatory framework, this ISP will be measured against the Ontario Electronic Stewardship (OES) plan that was approved by the Ministry of Environment on August 14, 2009. CWTA's plan shares OES' objective of diverting as many cell phones from Ontario landfills as practical, in the shortest possible timeframe. CWTA's plan differs from OES' plan, however, in that it does not involve the charging of any fees to Ontario consumers, and employs a baseline that reflects accurate collection levels.

CWTA is confident that the ISP presented here is comparable to that of other program plans in its ability to meet the requirements outlined by the *Waste Diversion Act (WDA)* and the *Waste Electrical and Electronic Equipment Regulations (WEEE)*.

## **1.2 Background**

In November 2009 CWTA commissioned a *Harris/Decima* study on cellular phone recycling in Canada. Over 4,000 Canadians 18 years and older, with a minimum of 400 respondents in each province, were contacted to participate in this telephone survey.

The survey found<sup>1</sup> that among Canadians who have previously owned a cellular phone, 11% recycled their last phone, 24% gave it away or sold it, and 6% threw it out. Not surprisingly, 39% of Canadians simply store their old cellular phones. When asked why they store their old cellular phones, 26% indicated they did not know what else to do with it; 16% were keeping it as a backup to an existing phone; and 10% were keeping it for a future need. On average, Canadians typically store their old cellular phones for 15 months.

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<sup>1</sup> The survey data provided is representative of the most relevant and/or common responses. Not all responses are shown, thus, the percentage values may not sum to 100%

The survey also found that 66% of Canadians who are currently storing an old cell phone would be willing to recycle it or return it to a cell provider. Only 21% said they would not recycle or return it, and 13% did not know whether they would.

Willingness to recycle is fairly consistent across all provinces, however Ontarians indicate being the least likely to recycle an old cell phone.

CWTA and its members have long recognized the importance of waste management to the environment and the economy, and support the need for a recycling and reusing strategy for mobile devices. This commitment can be evidenced through the establishment and operation of voluntary recycling programs of CWTA members. These programs, all initiated in the absence of any regulatory e-waste directives by provinces, have been well-received and have won numerous awards for their regard for the environment.

Because of the success of the corporate mobile device recycling programs, and in light of the industry's evaluation of its options for compliance with provincial requirements to include mobile devices in an electronic waste stewardship plan, the CWTA Recycling Committee opted to develop Recycle My Cell under the auspices of CWTA.

Under Recycle My Cell, brand owners continue to operate their own corporate programs to collect, reuse and recycle mobile devices. Consumer education and public awareness leverages the extensive retail and brand penetration of participating wireless service providers and handset manufacturers operating in Ontario. Consumers will readily be able to return mobile devices at all participating retail stores operated by brand owners within the province during normal business hours. In addition, consumers will be able to mail back unwanted devices using postage-paid labels when it is not convenient for them to return the devices to a drop-off location.

Recycle My Cell has received regulatory approval from the provinces of Nova Scotia (October 2008) and British Columbia (November 2009) and also operates as an officially recognized and Provincially approved stewardship program in Prince Edward Island, New Brunswick, Manitoba, Newfoundland and Labrador, and Saskatchewan. Recycle My Cell currently operates in all remaining provinces on a voluntary basis.

More details regarding the relevant corporate programs operated by Bell, Motorola, MTS, Rogers Communications Inc., SaskTel, TBayTel, TELUS, Videotron and Virgin Mobile Canada can be found in *Appendix A*. The programs operated by MTS, SaskTel and Videotron are not available in Ontario.

In addition, Canada's wireless carriers all partner with processors to promote refurbishment whereby reusable mobile devices are repaired and resold to consumers in other markets, thus diverting devices from landfill and giving them a useable second life.

Based on surveys, experience in other jurisdictions and anecdotal input, the industry exceeds any provincial expectations for waste diversion and is a leader in reusing and

recycling. In 2006, 2007 and 2008, members of CWTA collected 187,824, 341,724 and 360,167 wireless units respectively. Specific to Ontario it is estimated that members of CWTA's recycling program have collected: **73,082** wireless devices in 2006; **132,691** wireless devices in 2007; and **139,853** wireless devices in 2008.

## **2. Program Overview**

### **2.1 Brand Owners Participating in the Program**

Most, if not all, mobile devices have two brand names, images or logos clearly affixed to them. Typically one brand name is that of the cellular service provider while the second is that of the manufacturer of the device.

The following brand owners operate in Ontario and are currently covered by the CWTA ISP:

#### *Bell (Including Solo Mobile)*

Daniel Gagné  
Director, Corporate Responsibility & Environment  
*Bell Canada*

Tel: (514) 350-3188  
E-mail: daniel.gagne@bell.ca

#### *Motorola*

Matt Norton  
Dir. EHS Product and Business  
*Motorola*

Tel: (847) 576-0313  
E-mail: matt.norton@motorola.com

Otto Geiger  
Manager, Global Business Operations  
*Motorola*

Tel: (954) 723-8140  
E-mail: Otto.Geiger@motorola.com

#### *Nokia*

Ed Butler  
Environmental Affairs – Markets  
*Nokia, Inc.*

Tel: (972) 864-6329  
E-mail: Ed.butler@nokia.com



*Research In Motion*

John Smiciklas  
Manager, Sustainability and Corporate Responsibility  
*Research In Motion Limited*

Tel: (519) 888-7465 x 74081  
Email: jsmiciklas@rim.com

*Rogers Communications Inc. (Including Rogers Wireless and FIDO)*

Barry Krugel  
Director Operations, Device Management  
*Rogers Wireless Partnership*

Tel: (416) 935-7151  
E-mail: barry.krugel@rci.rogers.com

*Samsung*

Jennifer Groh  
Corporate Communications Manager  
*Samsung Electronics Canada Inc.*

Tel: (905) 817-6487  
E-mail: j.groh@samsung.com

*Sony Ericsson*

Steven G. Coston  
Technical Manager, Regulatory Project Office  
*Sony Ericsson Mobile Communications*

Tel: (919) 536-5727  
E-mail: steve.coston@sonyericsson.com

*TBayTel*

David Wilkie  
Regulatory Analyst  
*TBayTel*

Tel: (807) 684-2728  
E-mail: david.wilkie@tbaytel.com

*TELUS (including TELUS Mobility, MiKE and Koodo)*

Anthony Sesel  
Project Manager  
*TELUS mobility*

Tel: (416) 279-7524  
E-mail: anthony.sesel@telusmobility.com

*Virgin Mobile Canada*  
Edin Mesic  
Director, Supply Chain  
*Virgin Mobile Canada*

Tel: (416) 607-8605  
E-mail: edin.mesic@virginmobile.ca

The following brand owners do not operate in Ontario but are also currently covered by the CWTA ISP:

*MTS*

Fred Riddle  
Manager Environment Programs  
*MTS Allstream*

Tel: (204) 941-6521  
E-mail: fred.riddle@mtsallstream.com

*SaskTel*

Jodi Smith  
Manager, Community Relations  
*SaskTel*

Tel: (306) 777-5188  
E-mail: jodine.smith@sasktel.sk.ca

*Videotron*

Patrick Désy  
Senior Analyst/Regulatory Affairs  
*Quebecor Media Inc.*

Tel: (514) 380-4325  
E-mail: desy.patrick@quebecor.com

### **2.1.1 Brand Owner Induction**

Although Recycle My Cell is supported by the aforementioned brand owners, the program will accommodate all other mobile device brand owners, CWTA member or not, under appropriate terms and conditions. As such, CWTA will continue to use telephone and email campaigns to reach out to members of the Association, non-member brand owners and recyclers to encourage participation in this program and ensure an understanding of relevant regulations and the brand owners' resulting obligations. Brand owners may also contact the Recycling Manager at CWTA to get information on joining the program.

## **2.2 Recyclers Participating in the Program**

Brand owners participating in the program use several third-party companies to disassemble products and recycle components.

The main contacts for third-party companies that are also CWTA members are indicated below:

### *Global Electric Electronic Processing Inc. (GEEP)*

Dave Huculak  
Vice President Telecom Client Services

Tel: (705) 725-1919, Ext. 4301  
E-mail: dhuculak@geepglobal.com

### *GREENTEC*

Tony Perrotta  
President

Tel: (519) 624-3300, Ext. 223  
E-mail: tperrotta@greentec.com

### *ReCellular, Inc.*

Brandi Farwig  
Environmental Specialist

Tel: (734) 205-2217  
E-mail: bfarwig@recellular.com

## **2.3 Contact Information for the Program**

Oversight of and responsibility for this program belongs to:

Manager, Cellular Recycling Program  
CWTA  
1110-130 Albert St.  
Ottawa, Ontario  
K1P 5G4

Tel: 1 (613) 233-4888  
Toll-free: 1-888-797-1740  
E-mail: info@recyclemycell.ca / info@recyclemoncell.ca  
www.recyclemycell.ca / www.recyclemoncell.ca

## **2.4 Program Compliance**

CWTA is a wireless industry association that is led by a Board of Directors which is composed entirely of industry representatives. The Recycling Committee, created by

the CWTA Board and comprised of carriers and handset manufacturers, was tasked with creating a national industry-wide umbrella recycling program. Costs associated with the administration and operation of this program are internal to the CWTA's operating budget and/or absorbed by participating brand owners.

Due to the nature of the workings of the Association and its role to represent the wireless industry on a number of common issues, formal contracts will not be drafted between CWTA and its participating members. In order to be exempted from the Industry Funding Organization's Rules for Stewards as outlined in Section 34(6) of the WDA, CWTA proposes that each brand owner sign an Agency Appointment Letter that confirms their participation in the CWTA ISP. This is an approach that has been accepted in other jurisdictions (e.g., British Columbia). A sample of the proposed Agency Appointment Letter is included in *Appendix B*.

Formal contracts will be required where agreements are to be made with participating entities that are not members of CWTA.

CWTA and the represented brand owners are committed to ensuring the highest level of program participation possible at each collection point.

This commitment is facilitated through employee training and retail auditing programs performed by each brand owner. Through these processes, the brand owners have the ability to ensure compliance on the part of retail outlets with any and all corporate initiatives. Regular communications are also sent to retail outlets to remind stores of participation in corporate recycling programs.

In addition to these audits, some carriers routinely conduct 'mystery shopper' programs. Executives from outside the region visit numerous retail outlets under the guise of being a shopper, to verify that staff meets corporate standards in any number of areas, including special promotions or new programs, such as charitable or recycling initiatives. If any staff member or outlet is found to be out of compliance with corporate policy or practices, corrective action is initiated.

Monitoring consumer complaints is another routine method of tracking compliance to corporate standards. CWTA will ensure that any consumer dissatisfaction as registered with the Association will be tracked and directed to the main contacts at the respective partner program for resolution.

While audit and compliance processes already exist and efforts are made by brand owners to ensure full retail participation in all corporate programs, human factors must be taken into account. CWTA cannot commit to a 100% level of perfection at the retail level, but assures the province and other stakeholders that existing processes have proven to minimize problems at retail locations.

### **2.4.1 Dispute Resolution**

Each brand owner covered by the CWTA ISP is represented at the CWTA Recycling Committee. The CWTA Recycling Committee will provide guidance or make decisions on issues that are escalated to the Committee.

When the CWTA Recycling Committee is asked to provide its guidance or decision on unresolved issues, the Committee will use a consensus-based decision making model in its decision making process. Relevant information will be gathered and provided to the Committee to facilitate the discussions concerning the issue to be resolved. If the dispute cannot be resolved at the Committee level, the matter will be taken forward to the CWTA Board of Directors for resolution.

### **2.5 Responsibilities of Industry Steward**

CWTA will manage the program on behalf of the wireless industry. Responsibilities include:

- Liaisons with governments, consumers, and other stakeholders;
- Public education and awareness;
- Annual reporting and target setting;
- Induction of all interested and obligated brand owners who are not already participating in the program; and
- Maintaining contracts and relations with all levels of the program, including collection sites and sites of incidental waste.

Members of the CWTA Recycling Committee will act as advisers to the Association on the operation and further development of the program.

### **2.6 Program Principles**

Consistent with the principles set out in Ontario's legislative and regulatory framework for electronic recycling, CWTA proposes an ISP which will:

- Inform consumers of their options for reusing and recycling their mobile devices and accessories;
- Ensure environmentally conscious management of end-of-life mobile devices;
- Ensure all work under the program is done by certified and responsible organizations with the results of any and all audits conducted available to the Ontario Ministry of Environment (MOE) upon request;
- Operate in an economically efficient manner with full transparency of all reported figures;
- Ensure consistency with Canadian regulations at all levels of government and comply with CCME's *Canada-Wide Principles for Electronics Product Stewardship*;
- Be open to all obligated and relevant brand owners;
- Recover and responsibly recycle mobile devices which do not fall under the responsibility of any obligated brand owner (orphan, historic and imported); and

- Encourage fair competition between this and non-affiliated third-party collection programs, allowing them to operate without hindrance.

## **2.7 Program Period**

Recycle My Cell is a self-sustaining program with no pre-planned termination date. It will officially launch in Ontario upon approval and will operate within the province indefinitely.

## **2.8 Products Included in the Program**

Recycle My Cell deals specifically with mobile devices that were primarily manufactured to connect to a cellular or paging network, as well as accessories that accompany these devices. Examples of such devices include cellular phones, accessories such as headsets, chargers and batteries, wireless smartphones, wireless PDAs, removable external aircards and pagers.

Ordinary consumer electronics that were not primarily manufactured to connect to a cellular or paging network are not covered, nor collected, by the program. Examples of such devices are cordless phones, PDAs without integrated cellular connectivity, laptop computers and answering machines.

While a list of product definitions has been developed, it should be noted that a regular review of electronic products, either added or deleted from manufacturer product lines, will be required in order to ensure their inclusion in the program as appropriate. The list of product definitions will be updated annually, as required.

Recycle My Cell accepts all orphan, historic and imported mobile devices, as well as mobile devices from non-participating brand owners, when consumers return such product to the Recycle My Cell drop-off locations. That being said, under no circumstances should the willingness and openness of CWTA to accept cellular products from non-participating brand owners be utilized as an excuse to circumvent any applicable regulations and obligations laid out in the *WDA* and the *WEEE regulations*, or any future legislation or regulation, as they pertain to the legality of selling a mobile device when the brand owner does not operate, or is not part of, an approved electronic stewardship plan. The fact that Recycle My Cell will accept any wireless device does not exempt non-participating brand owners from the obligations set out in the regulations.

## **2.9 Fees**

Recycle My Cell operates with no fees charged to consumers purchasing or recycling mobile devices.

In the event that the program's current financial structure becomes uneconomical, the represented brand owners will consider other ways to ensure costs are not passed on to

consumers. It is the view of CWTA and the brand owners represented by this plan that consumers should not be responsible for the recycling costs, and the use of environmental handling fees would be a last-resort method of funding the program.

CWTA believes that financial accountability should be shared with those incurring the costs. As such, financial reporting will occur between CWTA and the brand owners it represents. However, as no funds are to be collected from the public for any aspect of this program, these reports will not be made public.

Further, the cost of running individual corporate recycling programs is considered proprietary information as each brand owner develops and implements individual communications and marketing programs.

## **2.10 Return Collection Facilities**

### **2.10.1 Locations and Accessibility**

As supported by independent survey data, the CWTA and its members believe that a return-to-retail model is the most appropriate and effective method available for wireless device collection, and reflects the principle of extended producer responsibility. Having dealerships act as collection sites provides a convenient method of device return as consumers can leave their old phones for recycling at the same location and time a new phone is purchased.

There are currently more than 970 drop-off locations in 126 communities across the province of Ontario. The Recycle My Cell network of collection sites is continually evolving and expanding as more retailers and brand owners join the program, and as companies introduce new retail stores and dealerships into the marketplace. Further, any municipal location, charity organization or corporate or private initiative that wishes to act as a collection site will be able to join the program as a collector.

Due to the addition of dealer sites, along with the changing nature of the consumer market, it should be noted that retail locations and program partner locations are subject to change from time-to-time and the [recyclemycell.ca](http://recyclemycell.ca) and [recyclemoncell.ca](http://recyclemoncell.ca) Web sites will provide the public with the most up-to-date list possible.

In addition to the collection sites, Recycle My Cell offers a variety of postage-paid mail-back options for anyone currently unable to reach a drop-off location for any reason.

Through the numerous collection facilities across the province, consumers have access to an extensive province-wide network to recycle end-of-life mobile devices and accessories. Most Ontarians live near a collection point, as shown in *Figures 1 and 2*, and identified in *Appendix C*.

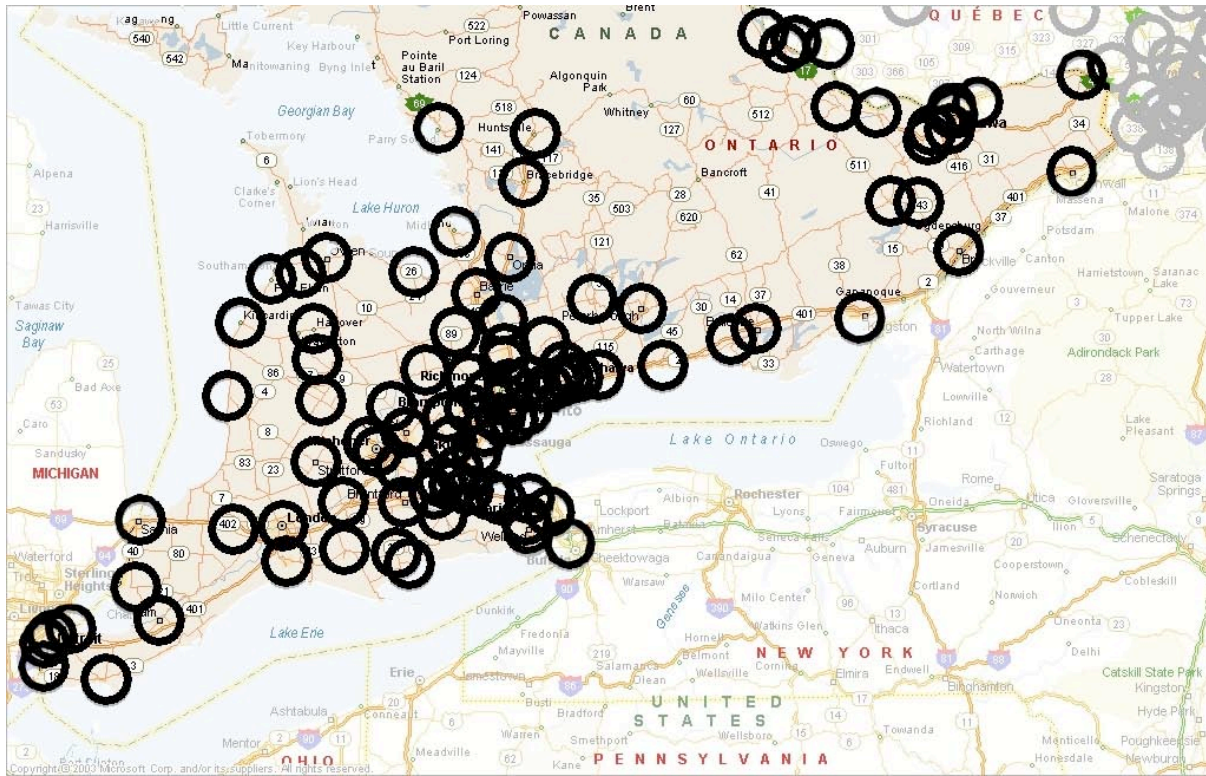


Figure 1 Drop-off location distribution map

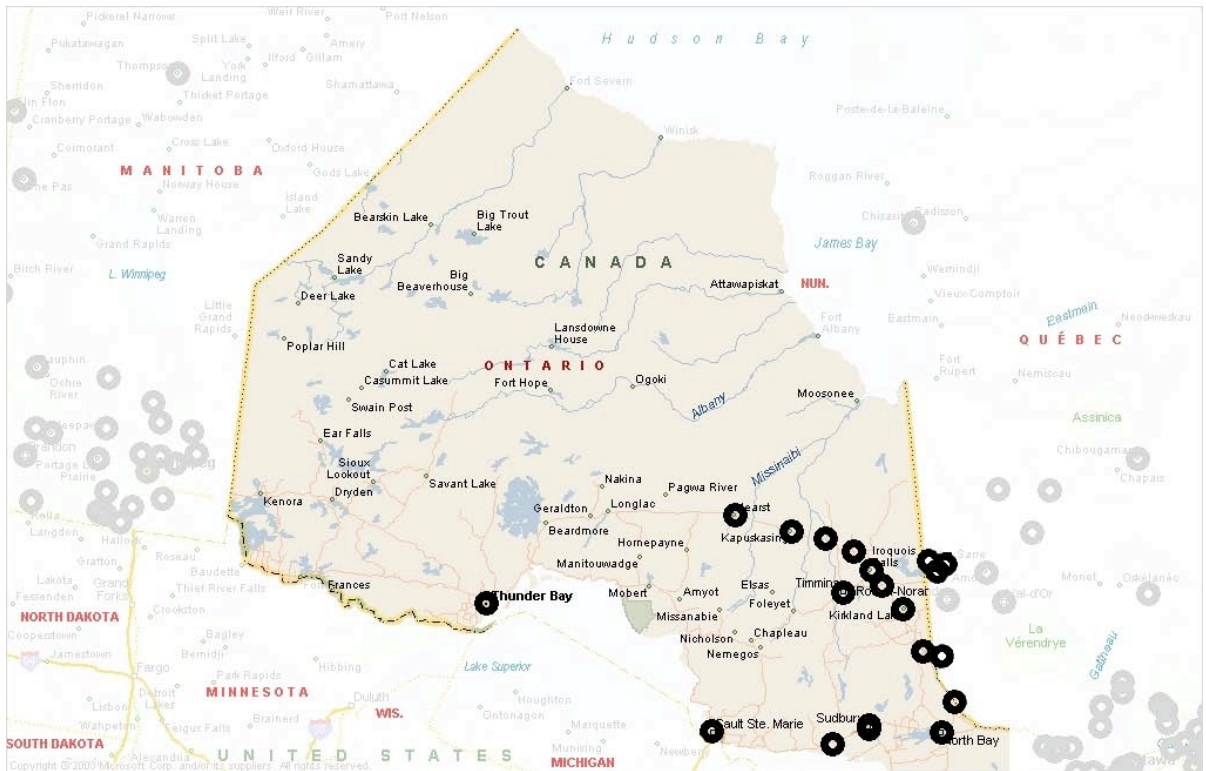


Figure 2 Drop-off location distribution map



### 2.10.2 Operating Hours

Collection points will operate during normal business hours. Consumers can locate details of operating hours of brand owners' retail stores via corporate Web sites.

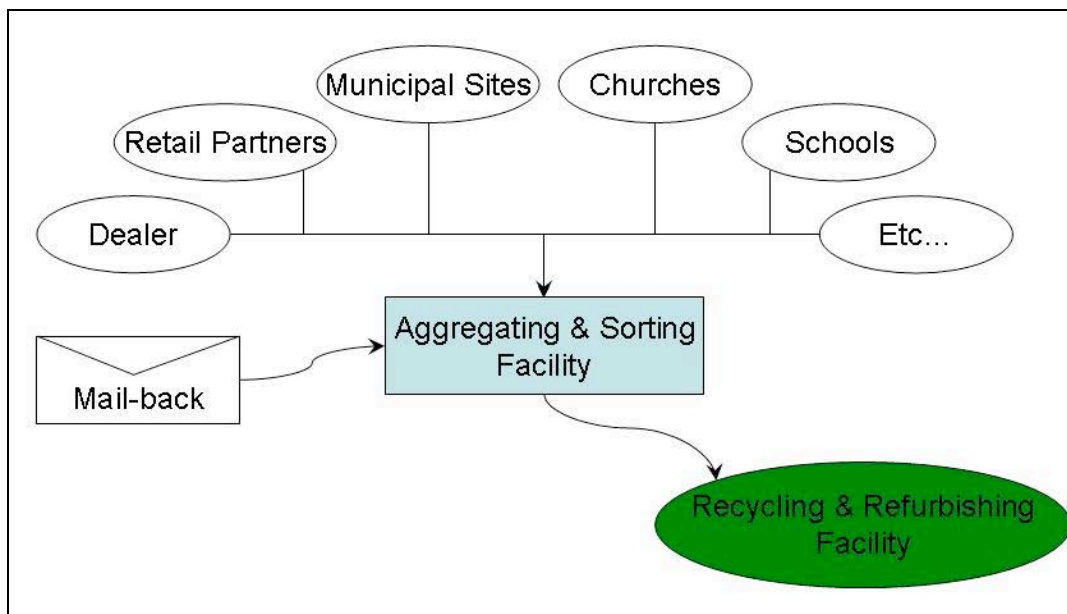
### 2.10.3 Mail-Back Option

Consumers who are unable to access a collection site will be able to recycle their devices and accessories using a variety of postage-paid mail-back options from participating brand owners. Mailing labels can be accessed through the [recyclemycell.ca](http://recyclemycell.ca) site and can be used for recycling all designated devices.

## 2.11 Methods of Recycling and Reusing

### 2.11.1 Flow of Collected Materials

Designated containers, located at each collection site, are stored until full and then shipped by courier to an aggregating and sorting facility. These aggregating and sorting facilities are located within the facilities of the processors and recyclers referenced in this plan, or in facilities of approved third-parties associated with these processors and recyclers. Here, the devices are sorted as described in Section 2.11.2 and then shipped to a recycling and/or refurbishing facility. This process is detailed in *Figure 3*.



**Figure 3** Flow-chart for cellular phone movement from collection point to recycler

### 2.11.2 Recycling Methods Used

Mobile devices received at collection points are shipped to processing locations where they are typically sorted into three categories: resalable devices, recyclable devices and accessories, and batteries.

When a collection box is opened at a processing location, devices are typically triaged according to model type and reusability. An operator electronically scans the unit and the system identifies whether it is a reusable handset or if it should be recycled. The operator places the handset in the appropriate bin location after performing a visual check that includes looking for external water damage, broken or bleeding LCD or exposed circuit board. If any of these defects are identified and cannot be easily repaired, the operator will indicate in the system that the unit is to be recycled and sort it accordingly.

*Accessories:*

- Chargers
- Headsets

*Batteries:*

- Nickel-cadmium
- Nickel-metal-hydride
- Lithium-ion
- Small-sealed-lead
- Mixed

All batteries are individually bagged or their contact points are taped and sealed to prevent shorting or corrosion.

All components are boxed with similar items at a quantity of 100 and each box is weighed and a label is generated with the exact weight. The information is then entered into an Excel worksheet, which is used as a packing slip. To reduce transportation costs, the boxes are then shipped to the recycler a maximum of once a month.

The central sorting facility tracks the following information for each item, where possible:

- Electronic Serial Number (ESN) of handset
- International Mobile Equipment Identity (IMEI) - for GSM products
- Manufacturer and model number
- Technology of handset
- Condition of handset
- Date and time handset was scanned into system
- Store number or number assigned to a collection point
- Quantity received
- Quantity resalable (tracked by unit)
- Quantity recyclable (tracked by weight)
- Weight of accessories recycled

All material is sent to approved downstream processors for refurbishment, recycling, reclamation or recovery. Currently, the only waste component is the rubber keypad, although ways to recycle it are being explored.

### 2.11.3 Options for Unwanted Mobile Devices

Recycle My Cell aims to prolong the useful life of mobile devices by encouraging customers to return their used devices rather than throw them away. The contribution of each member's media and communications expertise results in continuous reinforcement of program recognition and consumer participation.

After receipt of used products from program members, designated recyclers test each item. When possible, as is consistent with established recycling and reuse practices of cell phone carriers and manufacturers around the world, damaged products are refurbished, and products that meet the following functionality requirements for resale are reintroduced into the market:

- Powers up;
- Display present with no cracks, bleeding of pixels or chips;
- Display functions;
- No external corrosion or water damage;
- No exposed circuit board;
- Places a call (analog or digital).

Product recyclers take it upon themselves to advertise the qualified products and sell them at discounted rates. Phones are resold into the Ontario marketplace where there is no restriction in place to do so. Phones that cannot be resold into Ontario because of restrictions are sold into other markets. It is important to note that there is a well established market for refurbished phones in other countries and only those phones that meet defined criteria are shipped for reuse; phones at their end-of-life are sent downstream to approved partners in developed OECD countries for recycling.

### 2.11.4 Partnerships

The program uses several third-party companies to disassemble products and recycle components. They currently include: *FCM Recycling, Global Electric Electronic Processing Inc., GREENTEC, ReCellular, Inc. and Sims Recycling Solutions*. Business partners and all third-party providers used are carefully chosen to ensure that they meet all the necessary environmental standards.

#### ***FCM Recycling***

*Lavaltrie, Quebec, Canada*

FCM Recycling, a recycler of electronic equipment at the forefront of industry standards and regulations, is based in Lavaltrie, Quebec with customers from all over central and eastern Canada, as well as the northeastern United States. Their industrial facilities are outfitted with modern equipment to receive, separate and recycle end-of-life electronic material.

FCM Recycling is certified and abides by a government approved organization – Electronics Product Stewardship Canada (EPSC). EPSC has developed standards that have been incorporated into the legislation of several provinces.

In Quebec, FCM Recycling has been certified by the Quebec Ministry of the Environment as an e-waste recycling and shredding facility.

In Nova Scotia, FCM Recycling has been certified under the EPSC's Recycling Vendor Qualification Program (RVQP) and Electronics Recycling Standard (ERS). In addition they serve as a Primary Vendor for the Atlantic Canada Electronics Stewardship program; all downstream processors are also subject to the RVQP to ensure the highest levels of adherence to environmental, occupational health and safety, export and other standards.

FCM recycles end-of-life electronic goods such as cell phones. Once the item is received, FCM Recycling disassembles the equipment, separates metals from plastics, and processes the material to obtain pieces that are less than one inch in diameter. These are then sent to a refiner. At the refinery, the pieces are melted down to obtain what is called "secondary-primary material". This can then be used in exactly the same way as if it were raw material to make new consumer and industrial goods.

With proper recycling, e-waste is processed into raw material that becomes new consumer and industrial goods.

***Global Electric Electronic Processing Inc.***

Barrie, Ontario, Canada

*"The mission of Global Electric Electronic Processing Inc. (GEEP) is to work collaboratively with clients to maximize their return on excess and end-of-life inventory in an environmentally safe manner with a zero landfill objective."*

Every incoming load is weighed with documented scale tickets and bar-coding before a computer controlled inventory and destruction/recycling process takes over. Web based customer support is available for inventory control and sale of excess and refurbished products.

GEEP is ISO 9001<sup>2</sup> and ISO 14001<sup>3</sup> certified. The processing method (refurbishment, resale or destruction) is determined by the client and the destruction of all proprietary products is documented. Hazardous waste separation, registration and regulatory compliance is also documented and environmental, health and safety policies and emergency response and fire prevention plans are also in place. GEEP is fully insured, including its environmental policies, and has a stated corporate objective of a zero landfill contribution. GEEP is a division company of the *Barrie Metals* group of companies, with locations in Canada, the United States of America and Asia. It

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<sup>2</sup> See *Appendix D* for description of ISO standard 14001

<sup>3</sup> See *Appendix D* for description of ISO standard 9001

has one of the largest, most comprehensive, state-of-the-art processing facilities of e-waste globally.

**GREENTEC**

Cambridge, Ontario, Canada

GREENTEC is a leading provider of environmentally responsible cell phone and electronic waste disposal solutions. Specializing in reverse logistics and third-party services for retailers, manufacturers and consumers, GREENTEC operates THINK RECYCLE - an environmental fundraising program that collects, recovers and recycles over 200,000 cell phones each year, from over 12,000 locations.

GREENTEC's vast network of aftermarket buyers allows them to maximize value return on a broad selection of makes and models. As such, they operate one of the largest retail cell phone recycling programs in Canada.

Cell phones shipped to GREENTEC are evaluated for reuse or recycling by an industry-leading Production Ready sorting process. GREENTEC offers payment on items suitable for resale, though customers may choose to make charitable donations in lieu of accepting payment.

To ensure information security, all traces of personal and corporate information are destroyed. Cell phones that are not suitable for reuse are dismantled and harvested for parts. GREENTEC's ISO 14001 registered recycling processes make plastics and metal recovery possible. Downstream partners are audited to ensure no materials are sent to landfill or shipped to developing countries.

The company also offers secure destruction whereby cell phones are ground down and destroyed in accordance with local environmental, health and safety regulations and Electronic Recycling Standards. GREENTEC can provide a video of the destruction process and a certificate of destruction.

GREENTEC has been trusted by clients worldwide since 1995. Their zero-landfill policy, certified downstream processing, government-approved processes and ISO 14001 registration ensure corporate responsibility toward protecting the environment.

**ReCellular, Inc.**

Ann Arbor, Michigan, USA

ReCellular uses Sims Recycling Solutions, located in Brampton Ontario, to process all wireless devices and accessories that are collected in Canada.

ReCellular's comprehensive commitment to environmental protection has won numerous national and local awards. All devices and accessories that cannot be reused are recycled and the company recycles thousands of tons of electronic

scrap every year. With millions of dollars donated to charities, tens of millions of devices recycled or reused and customers in more than 40 countries, ReCellular has developed a global network dedicated to finding the most responsible solutions for the handset industry.

ReCellular routinely processes used electronic products, such as cellular telephones and accessories. The majority of this product is recycled through resale. Their processing also generates some waste from un-sellable material, such as obsolete handsets, batteries, chargers, cigarette lighter adapters and leather cases. Certified smelters contracted nationwide help provide them with the optimum return for scrap products, and assure complete disposal of the material with little to no impact on the environment. No e-waste goes to landfills or incinerators directly or through intermediaries. No electronic scrap is shipped to "underdeveloped countries". ReCellular's certified recycling partners are likewise prohibited from sending e-waste to any country not belonging to the *European Union* or the *Organization of Economic Cooperation and Development* (OECD), as directed by the *Basel Convention*.

The ReCellular environmental management plan is also ISO 14001 certified and includes internal audits requested by management, periodic random quality checks, and annual revisions to its environmental policies. These internal procedures were developed to change and improve with the evolving technological and social issues of the future.

All partners that ReCellular utilizes to recycle mobile devices are carefully and extensively evaluated to ensure environmental compliance. Recycling facilities interested in accepting non-functional mobile devices and batteries must first complete an environmental risk evaluation form provided by ReCellular. This is an extensive document that questions recycling vendors' processes and procedures. All of the forms submitted are diligently reviewed by ReCellular's internal environmental staff.

***Sims Recycling Solutions***  
Brampton, Ontario, Canada

Located in Brampton, Canada's premier recycler provides the utmost in security and asset management of end-of-life electronics. Sims manually de-manufactures materials in their work cells where batteries, bulbs and other hazards are removed and sorted before electronics are completely shredded and separated.

100% of all electronic hardware is recycled; no hardware goes to landfill or to illegal export. In addition, Sims Recycling Solutions conducts full physical audits of all downstream vendors, tracking materials to their final resting place

Sims Recycling Solutions also leads the industry in the secure management and destruction of all electronic materials. They are an approved recycler through the EPSC (Electronic Product Stewardship Canada) recycling program, and their process has been approved by the RCMP (Royal Canadian Mounted Police). In addition, the federal government has designated Sims as a Controlled Goods Processor. They have the highest approval for secure destruction and recycling in the industry.

## **2.12 Designing for the Environment**

The goal of “designing for the environment” is to reduce the environmental impacts of a product throughout its life cycle. This involves careful consideration over concerns including the manufacturing materials used in electronic equipment, the amount of energy consumption used and also the potential pollution associated with the product’s disposal. The most effective way to satisfy this provision is to promote changes during the design of the product.

### **2.12.1 Improving Product Life Cycle Management**

Our handset manufacturers have already made a number of efforts to eliminate or to reduce the environmental impacts of a product throughout its life cycle by minimizing the amount of new materials needed to manufacture their devices, and by incorporating energy saving features into their designs. As examples:

- Nokia is promoting “green features” into as many of its mobiles as possible. Such features include a light sensor that detects natural light and thus allows the phone to save energy. In addition, most Nokia phones now beep when fully charged to alert the owner to detach the charger from the wall socket.
- Motorola’s Renew mobile phone is made with 25% post-consumer plastic from recycled water bottles which helps eliminate plastic from landfills. The use of recycled plastic takes twenty per cent less energy to produce than conventional plastics while continuing to deliver uncompromised mechanical performance. The phone housing is 100% recyclable. A prepaid shipping envelope is also included for buyers to send in their old mobile phone for recycling.
- Sony Ericsson developed the GreenHeart phone as part of a concept design study to address impacts at every stage of their products’ life cycle. The GreenHeart phone features bio-plastic housing and a recycled plastic keypad; its phone charger uses 3.5mW of standby power. The GreenHeart phone, while not commercially available in its concept form, will influence the Sony Ericsson product line going forward.
- Samsung Electronics Canada has launched the Samsung Reclaim<sup>(TM)</sup>, designed with environmentally-responsible components, a bio-plastic casing and fully recyclable packaging. Made from 80 per cent recyclable materials, Samsung Reclaim offers environmentally conscious consumers a perfect blend of responsibility.

Our carriers also aim to prolong the useful life of all mobile devices, not just those they sell, by encouraging customers to return them rather than throw them away. The carriers' support of charity programs adds an additional incentive for consumers to return their unwanted devices. The recycling message is reinforced by each member's corporate messaging which results in continuous reinforcement of program recognition and consumer participation.

### 2.12.2 Pollution Prevention Hierarchy

Our handset manufacturers and recyclers continue to find ways to reduce the environmental impacts of their products.

Our handset manufacturers provide the management of the product in adherence to the order of preference in the pollution prevention *hierarchy*. For instance, a number of efforts have been made to reduce the environmental impact of producing the product by eliminating toxic components and increasing energy and resource efficiency and also to redesign the product to improve reusability or recyclability. Refer to the aforementioned examples in Section 2.12.1 regarding the initiatives made by our handset manufacturers.

In addition, our processors employ policies and processes to ensure that where possible reusable devices are re-introduced into the market. When reuse is not possible, products are recycled using approved methods. Of the mobile phones entering the recycling process, 96% of the original input by weight is material destined for recycling, reclamation and recovery:

- **Reuse** – Recyclers inspect and test handsets to certify them for reuse using the functionality criteria identified in Section 2.11.3. This process includes removing any asset tags, as well as all traces of personal and corporate information not previously removed by the customer before the phone is recycled. Where a device is certified for reuse it is released for resale.
- **Recycle** – Handsets not suitable for reuse are either disassembled for harvesting spare parts or ground down for the recovery of precious metals. The secure destruction and recycling process make plastics and metal recovery possible.

Some processors (GREENTEC for example) are able to recycle certain plastic phone casings depending on the type of plastic used, i.e. PET and Polystyrene. These plastics can then be used to make other products, such as flower pots or plastic trays for various goods.

All scrap material is sent to approved downstream processors which are audited for environmental health and safety compliance, and to ensure that no e-scrap materials are sent to landfill or to developing countries.



- **Recovery** – Circuit boards are shredded and sent to a smelter for precious metal recovery.

The 4% of the product that is not recyclable is mainly made up of plastics that are found in most cell phones; this material is recovered as fuel/energy in the precious metal refining process. CWTA is aware that the current definition of 'material recovery', as used by the Ontario government, does not include material used as an energy source as 'recovered' material. Our processors are continually refining their processes to reduce the amount of non-recoverable material associated with the recycling of cell phones and accessories.

## **2.13 Consumer Education and Public Awareness**

Once Recycle My Cell is formally approved in Ontario, CWTA will undertake consumer education and public awareness initiatives to ensure consumers are fully informed of the industry's recycling initiatives. As part of the consumer awareness plan the CWTA commits to hosting a media launch within weeks of approval. CWTA will formally extend an invitation to the Minister of Environment, representatives from Waste Diversion Ontario (WDO), senior officials, community partners and CWTA members to participate in the launch event. CWTA will support the launch event through a comprehensive media buy. To support the ongoing Recycle My Cell program, the CWTA also commits to make customers aware of their options for reusing and recycling their mobile devices.

Corporate recycling programs have included extensive consumer awareness campaigns in the past and will continue to promote their programs as this umbrella program moves forward.

### **2.13.1 CWTA Initiatives**

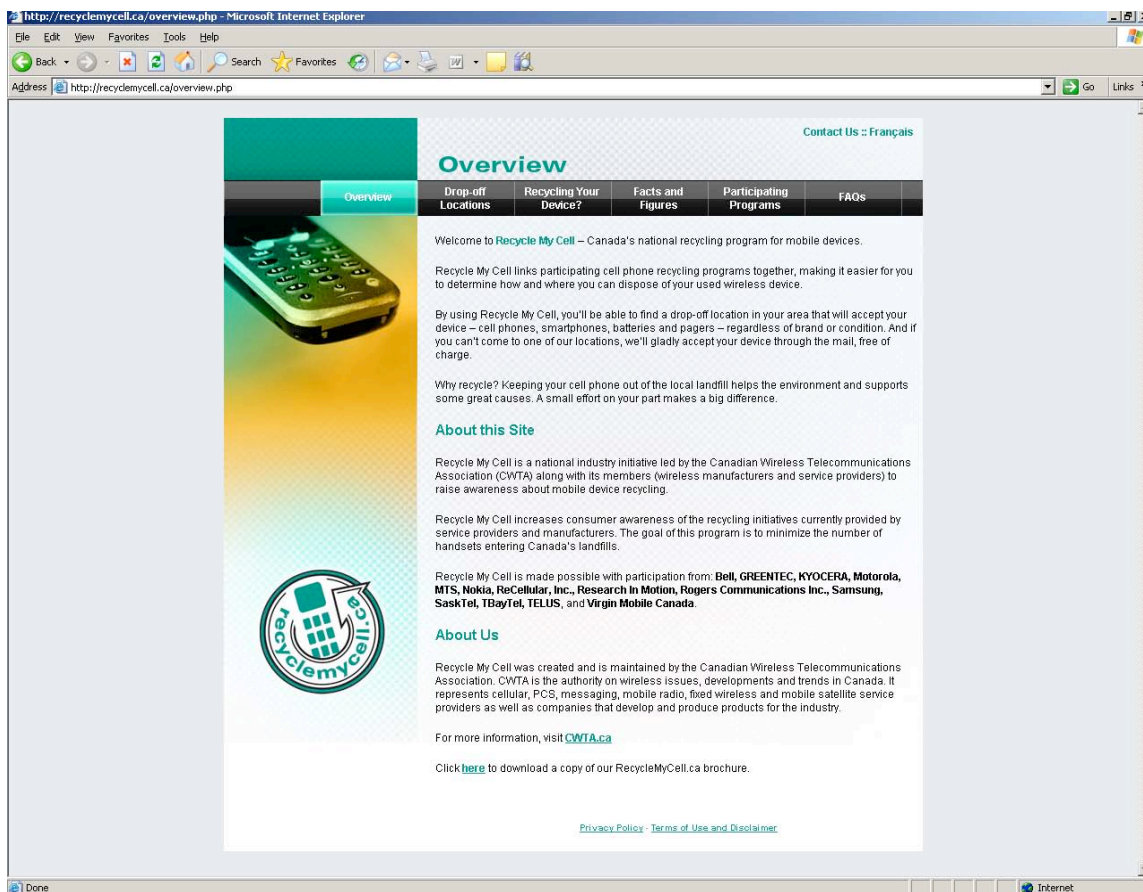
Recycle My Cell was officially launched in Nova Scotia on January 20, 2009 after having received regulatory approval in the province in October 2008. Launch events have also been held in all provinces that have since officially recognized Recycle My Cell as their cell phone recycling stewardship program. Upon formal approval, CWTA will begin planning a media launch event in Ontario, similar to that held in other provinces, to officially launch the Recycle My Cell program. The President of CWTA, along with high-profile brand owners and members of the Ontario Ministry of the Environment and WDO will be invited to attend in order to emphasize the industry's and province's commitment to e-waste diversion. Press releases and advertisements will be planned to supplement the media launch event.

To provide on-going support to the Recycle My Cell program, the CWTA created a Web site that serves as the central hub for the program. Information about recycling, member programs, collection sites and steps to clear personal information is readily available to consumers via this site. Consumers without Internet access can call a toll-free number (1-888-797-1740) operated by CWTA staff.

Current screen shots of [www.recyclemycell.ca](http://www.recyclemycell.ca) are shown in *Figure 4* and *Figure 5*. Promotional materials (brochures, tent cards and posters) were also developed for use at municipal sites, dealer sites that do not run their own program and wherever else such materials may be required. The bilingual brochure provides details about the Recycle My Cell program, including the Web site address and toll-free number for those requiring further information. The 5"x7" bilingual tent card or 11"x17" poster (available in either English or French), identifies the municipal site or dealer site as a Recycle My Cell drop-off location and includes the Web site address.

The Web site and brochure are also used to brief and prepare stakeholders for the launch of the program.

CWTA intends to monitor the reaction to initiatives associated with this program. Both CWTA and its members will give consideration to modifying their respective consumer education and public awareness campaigns as necessary.



**Figure 4** Overview page for [recyclemycell.ca](http://recyclemycell.ca)

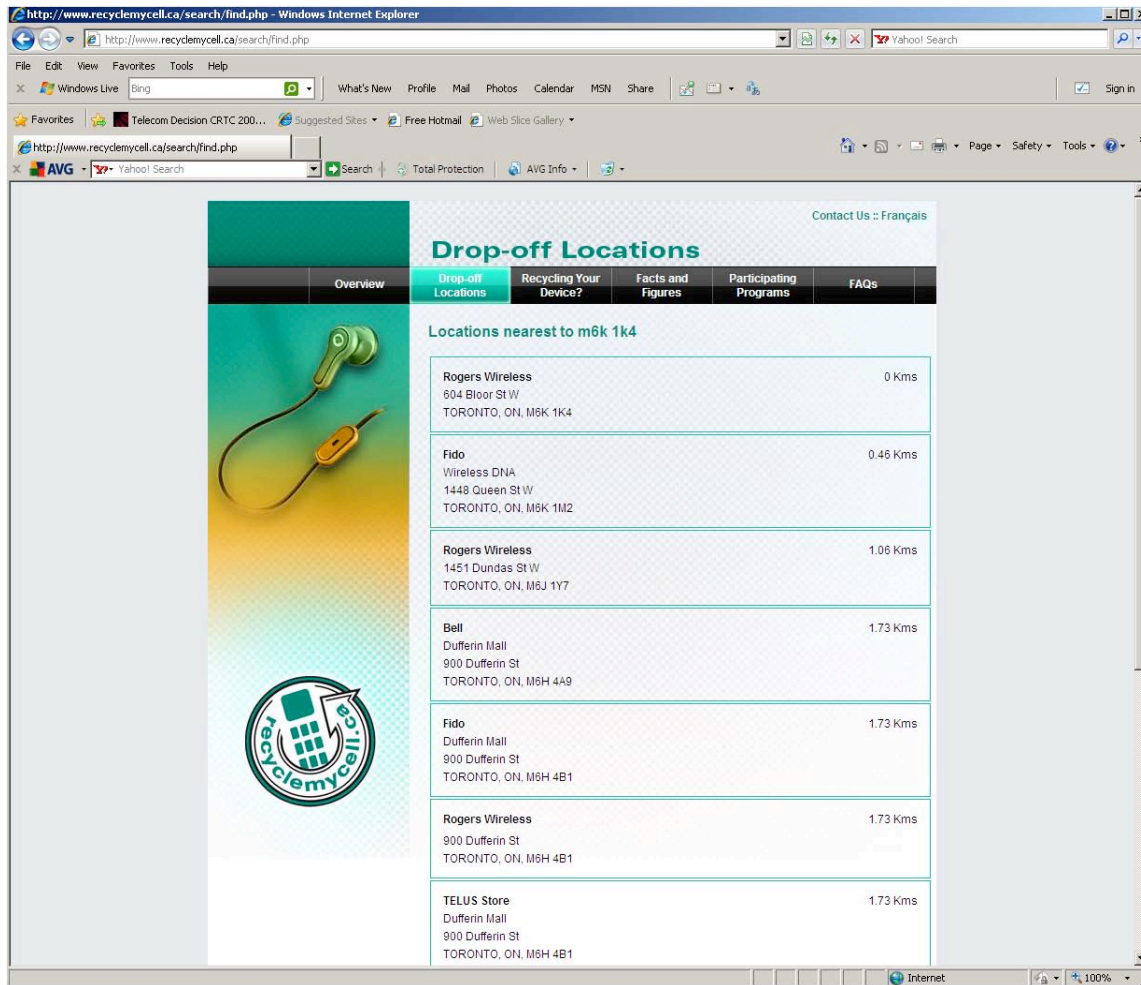


Figure 5 Search results page for nearest drop-off locations

### 2.13.2 Corporate Initiatives

In the past, the promotion of corporate recycling initiatives has included extensive marketing campaigns, including paid advertisements (in print media, television and other venues), in-store marketing and competitive recycling drives.

The extent of corporate marketing for cellular phone recycling will not diminish with the implementation of CWTA's program and awareness initiatives. Each brand owner will continue to have its own marketing plans in place, which may include press releases coinciding with the Ontario launch of this program and continued marketing via advertisements, PSAs and corporate recycling Web pages.

The brand owners have agreed to place, where appropriate, Recycle My Cell branding on marketing materials. This will identify corporate programs as a participant in the national industry-wide initiative. Such branding could include placing the Recycle My Cell logo on advertising materials and linking to recyclemycell.ca from brand owners' corporate recycling Web pages.

The operators of each program under the Recycle My Cell umbrella have committed to ensuring that staff at all dealer locations will be well versed in the CWTA program and that signage will be present and placed in visible and accessible locations.

In addition, many of the corporate recycling programs developed new in-store promotional material to accompany the official Recycle My Cell launch in Nova Scotia. These materials have now been distributed to collection sites across Canada. Examples of corporate promotional materials are included in *Appendix E*.

### **2.13.3 Cooperation with Other Stewardship Programs**

CWTA is committed to working with other stewards and stakeholders to minimize potential consumer confusion regarding the various recycling programs operating in the province.

With respect to other e-waste programs, the Recycle My Cell Web site currently redirects visitors to the appropriate e-waste program site in each province (i.e., ACES, ESABC, SWEEP, etc.). In addition, in Nova Scotia as an example, the ACES site also redirects visitors wanting to recycle cell phones to the Recycle My Cell site.

CWTA fully supports the concept of Multiple Program Management with respect to cooperative and complementary recycling programs for end-of-life cell phones and related products in Ontario. CWTA looks forward to coordinating and cooperating with other program managers, as appropriate, in areas such as promotion, consumer awareness and data sharing.

### **2.14 Agreements with Municipalities**

The program does not currently contemplate formal agreements with municipalities, however, municipalities can voluntarily agree to become drop-off locations.

No reimbursement or collection incentives are offered to collection sites.

### **2.15 Annual Reporting**

#### **2.15.1 Targets and Available for Collection Data**

Recycle My Cell is an industry program that focuses on delivering tangible waste diversion results. This is achievable as a result of (1) the program's reliance on the distribution network of wireless service providers and the support provided by handset manufacturers and (2) the inclusive nature of the program (handling fees are not imposed on the consumer and all cell phones are accepted regardless of make (including widowed and orphaned products)).

The draft plan that was submitted to WDO on November 17, 2009 relied upon data provided by the carriers. Indeed much of the provincial breakdowns we include in the

plan are an estimate of carrier information at the national level. This is consistent with the plans that have been submitted in other provinces.

In addition, steps have also been taken to leverage publically available information to estimate the quantity of handsets available for collection. CWTA used the average *churn* rate (annualized) multiplied against the full subscriber base as an input for the Life Cycle Model<sup>4</sup>. *Churn* is defined as the number or proportion of subscribers who leave their carrier over a period of time; these customers are either becoming new subscribers at another carrier or not getting a new account. Because *churn* represents customers leaving, it can reasonably be assumed that those corresponding handsets would become available for collection or enter a *second life*. Since the industry has net positive growth, there are at least as many sales as people churning, therefore *churn* gives an accurate idea of new phones entering the market.

A Life Cycle Model (described in *Appendix F*), is utilized because research indicates that old handsets are often sold or given away and therefore take on a *second life*. In addition, new handsets are not consumed immediately and typically have a *first life* that spans 3 years.

Upon reviewing the initial draft RMC plan, WDO questioned the use of carrier data as well as the use of *churn* statistics.

CWTA submits that the carrier subscriber data and the *churn* statistics are currently the best available data to model collection targets. That being said, CWTA commits to working with the manufacturers and carriers to obtain better handset sales information going forward. However, given the realities of the purchasing arrangements between carriers and manufacturers and the subsequent distribution of handsets by the carriers across the country, obtaining better data is complicated and will take time. The challenge posed by the realities is described below.

The major wireless service providers operating in Ontario have operations across the country. Handset manufacturers are global operators. It is understood that in Ontario the brand owner is the device manufacturer even if the device is dual branded (i.e. the device contains the name of both the carrier and the manufacturer). However, this is only true if the manufacturer is a “registered business” in Ontario. Therefore, if a carrier buys 100 handsets from a manufacturer, the manufacturer is required to report the sales data and is responsible for a program that ensures the devices are recycled properly at end of life. If the carrier buys 100 handsets from a manufacturer that is not a registered business in Ontario, then the carrier is the brand owner.

Most handset purchases by carriers for sales across the entire country occur in Ontario and most, if not all, handset manufacturers are registered Ontario businesses. Strictly speaking, all handset sales in Canada should therefore be reported as handsets available for collection in Ontario whereas the reality is that Ontario makes up approximately only one-third of the Canadian wireless market.

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<sup>4</sup> CWTA has provided WDO with a working copy of the Life Cycle Model in confidence.

In this example, of the 100 handsets our carrier purchased, only about 33 would be sold in Ontario and therefore should be reported as available for collection. Mechanisms are required to determine the number of handsets sold in Ontario (and every other province). Indeed, since most handset manufacturers are not registered business in all provinces, the brand owner will change from manufacturer to carrier (as first importer) between provinces. This is an issue that CWTA would like to work together with all provinces to resolve so that a common agreed upon approach to data reporting could be developed. CWTA assumes that other industries would share an interest in the development of a common national approach.

Fortunately the data challenge we face does not, and will not, detract from the operation of Recycle My Cell. As noted at the beginning of this section, the RMC program is free (handling fees are not imposed) and the program takes back all cell phones regardless of make (including widowed and orphaned product). While improving the quality of available data is a concern, it should not impede the approval of the ISP nor does it affect ongoing operation of the program.

### **2.15.2 Targets**

Recycle My Cell will focus on two primary areas: (1) keeping product out of the municipal waste stream through collecting, reusing and recycling; and, (2) doing so in a socially, economically and environmentally responsible manner.

CWTA is committed to working with the province of Ontario to ensure that discarded wireless products are managed in a responsible manner.

Based on surveys, experience in other jurisdictions and anecdotal input, the industry exceeds any provincial expectations for waste diversion and is a leader in reuse and recycling.

Performance indicators that can be used to evaluate the Recycle My Cell program may include the following:

- **Product Collection**
  - Indicator: Absolute collection.
  - Method to evaluate: Devices collected on an aggregate regional and/or provincial basis.

**Table 1 CWTA Available for Collection, Estimated Collection Targets and Collection Rate**

Year	CWTA Available for Collection (units)**	CWTA Estimated Collection (targets, unit)	Collection Rate	CWTA Available for Collection (tonnes***)	CWTA Estimated Collection (targets, tonnes***)	Collection Rate
2006	904,369	73,082*	8%	181	15	8%
2007	1,013,146	132,691*	13%	203	27	13%
2008	1,132,714	139,853*	12%	227	28	12%
2009 <sup>‡</sup>	1,260,027	194,150 <sup>#</sup>	15%	252	39	15%
2010 <sup>‡</sup>	1,382,936	299,691	22%	277	60	22%
2011 <sup>‡</sup>	1,499,575	393,553	26%	300	79	26%
2012	1,613,275	493,836	31%	323	99	31%
2013	1,726,883	604,409 <sup>†</sup>	35%	345	121	35%
2014	1,847,329	720,458 <sup>†</sup>	39%	369	144	39%

\* For years 2006, 2007 and 2008, the CWTA Estimated Collection figure is based on actual national collection data; the resulting Ontario figures for each year are an estimate of the amount collected in Ontario based on Ontario's percentage of the national population.

# For 2009, the CWTA estimated that 500,000 cell phones will be collected nationally; based on Ontario's percentage of population, it is estimated that 194,150 of those cell phones will be collected in Ontario.

\*\* CWTA Available for Collection data has increased from previous submitted information as a result of changes to the LCM.

† CWTA Estimated Collection in 2013 and 2014 has increased from previous submitted information as a result of changes to the LCM.

\*\*\* The weight of devices available for collection includes the weight of batteries within the devices.

‡ Churn input into the LCM for Q3 2009 and Q1 to Q4 2010 and 2011 has been estimated in order to allow for the development of a full data set for the years 2012, 2013 and 2014.

Table 1 shows the revised<sup>5</sup> Available for Collection estimates developed using the Life Cycle Model, Estimated Collection Targets, as well as the Collection Rate achieved or to be achieved.

In an effort to find the most accurate estimate of phones that are available for collection CWTA used *churn* data as an input for the Life Cycle Model.

Targets: In 2006, 2007 and 2008, members of CWTA collected 187,824, 341,724 and 360,167 wireless units respectively. Specific to Ontario it is estimated that members of CWTA's recycling program have collected: **73,082** wireless devices in 2006; **132,691** wireless devices in 2007; and **139,853** wireless devices in 2008.

It is estimated that members of CWTA will collect 194,150 cell phones in Ontario in 2009. Data is currently being compiled to evaluate whether this target has been met.

Collection targets for 2009-2014 were developed by observing what is available for collection in those years and also by taking into account previous collection rates. Members of CWTA are currently achieving an average increase of roughly 3% per year in collection rates. This increase is being achieved with the present level of carrier advertising and promotion, and in an environment where other groups and charities actively collect cell phones at the same time.

In 2010, CWTA expects to see a collection rate of 22% (from 15% in 2009) as a result of increased advertising and promotion to support the launch of Recycle My Cell in Ontario. CWTA commits to working toward increasing the collection rates outlined in the above table. By 2014 the Recycle My Cell collection rate will be targeted at 39%.

OES' collection target rate increases by about 3% per year<sup>6</sup> which is in line with CWTA's average collection target rate of 4% per year. CWTA believes that the collection targets outlined in Table 1 are both realistic and attainable.

- Awareness
  - Indicator: Percentage of population aware of the program.

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<sup>5</sup> Data contained in Table 1 has been revised from that provided in the November draft as a result of changes made to the Life Cycle Model. The assumptions used in the Life Cycle Model were updated to reflect the 2009 National Cell Phone Recycling Study (November 2009). The amount of cell phones available for collection has increased by approximately 16% per year mostly due to the change in the length of the *second life* and the availability of an extra 10% of phones that no longer enter a *second life*. Changes that were made to the amount of phones being kept in storage, reused or discarded were very minor.

<sup>6</sup> See Table 2 **CWTA and OES Collections/Targets (tonnes)**.



- Method to evaluate: Annual survey to gauge consumer awareness and propensity to participate in a mobile device recycling program.

CWTA has conducted a national consumer study to determine the baseline level of awareness for cell phone recycling programs.

Based on the November 2009 national Harris/Decima survey, 46% of Canadians are aware of recycling programs (46% of Ontarians are aware also). Cell phone companies are the most recognized for recycling programs (29%), followed by electronic retailers (13%). Approximately 1% of consumers (nationally and in Ontario) responded that they were aware of the Recycle My Cell program unprompted; this figure increased to 10% when prompted.

<b>% of Respondents Aware of Programs</b>	<b>National Total</b>	<b>Ontario Total</b>
Recycling programs in general	46%	46%
Recycle My Cell - unprompted	1%	1%
Recycle My Cell – prompted + unprompted	10%	7%

CWTA 2009 National Cell Phone Recycling Survey conducted by *Harris/Decima* (Nov. 2009)

Target: Increase awareness of cell phone recycling nationally to 60% by November 2010 and to 80% by November 2015.

Target: Increase awareness of the Recycle My Cell program nationally, for unprompted responses, from the current 1% baseline to 10% by November 2015.

	<b>Cell Phone Recycling Awareness</b>	<b>Recycle My Cell Awareness</b>
	Canada (Target)	Canada (Target)
2009 Baseline Year	46%	1%
2010	60%	2.5%
2011	64%	4.0%
2012	68%	5.5%
2013	72%	7.0%
2014	76%	8.5%
2015	80%	10%

It is important to note:

- Increasing the awareness rate among those already owning or intending to own a cell phone will more readily translate into an increase in usage of cell phone recycling programs.
- An increase in awareness of recycling programs may not translate into an increase in phones collected by Recycle My Cell, especially given the number of alternate programs (charity, retailer, etc.) that exist within the province.
  
- Indicator: Number of visitors to the recyclemycell.ca web site.
- Method to evaluate: Tracking of number of visitors to the recyclemycell.ca Web site.
  
- Participation and accessibility
  - Indicator: Accessibility of drop-off locations measured by the population within a certain proximity to drop-off location, or by the average travel distance to a drop-off depot.
  - Method to evaluate: Map to highlight the number of drop-off locations.

At the time of plan submission, there are more than 970 established drop-off locations in 126 communities in Ontario. The number of drop-off locations correlates to the number of corporate retail locations in the province. Where there is the ability to use a cellular phone there is a retailer and therefore a means to recycle it. The drop-off locations are included in the recyclemycell.ca database; residents are able to search this database on the basis of postal code to find the 10 locations nearest them. Through the numerous collection facilities across the province, consumers have access to an extensive province-wide network to recycle unwanted mobile devices and accessories. The vast majority of Ontarians, more than 80%, live within 15 km of a collection point.

In addition, where no retailer exists, consumers have access to 4 different pre-paid mail back options accessible through recyclemycell.ca. In addition to the mail-back option the CWTA will consider adding municipal locations, charity organizations, corporate or private locations that wish to act as a collection site will be able to join the program as a collector.

The CWTA will continue to maintain the list of drop-off locations and mail-back options on the recyclemycell.ca Web site in order to facilitate the recycling of mobile devices.

Target: Increase the number of Recycle My Cell drop-off locations by 1% per year from 2010 to 2014.

Year	RMC Drop-off Locations	Target Growth Rate
2009 (Baseline)	976	
2010	986	1%
2011	996	1%
2012	1006	1%
2013	1016	1%
2014	1026	1%

It is important to note:

- In areas where new service providers are entering the market, or in areas where the provision of cellular network coverage is extended, there may be a growth of new retail locations, and therefore potentially an increased number of drop-off locations. This is not expected to be a sustained year over year growth.
  - Retailers are located where wireless coverage exists and people are able to use cellular phones.
- Diversion
  - Indicator: Post-collection fate of material.
  - Method to evaluate: Figures provided from recyclers concerning the allocation of product that was reused, recycled, recovered as energy and land-filled as defined in the pollution prevention hierarchy.

Cell phone recycling programs that fall under the Recycle My Cell banner were operating for some time before any regulatory requirement to do so was in place. Recycle My Cell leverages the existing business process for both service providers and recyclers. As such, the internal processes used for the refurbishment and recycling of wireless devices, as well as the process to track these, may vary. Recyclers have not been required to report on the percentage of collected product that was reused or recycled to-date and these processes will need to be put in place.

At the most basic level, all phones that are collected by the program are diverted from landfill whether through reuse, recycling or recovery.

- Reused phones are re-supplied into the market and are 100% diverted from landfill.
- Of those phones entering the recycling process, 96% of the original input by weight is material that is diverted from landfill and destined for recycling, reclamation and recovery.
  - The remaining 4% is used as an energy source for the precious metal recovery process and as such cannot be considered to be diverted.

Developing meaningful reuse targets is challenging<sup>7</sup>. In the case of wireless devices the amount of product that can be refurbished for reuse is dependent on many factors that are not controllable, including the condition of the phone at time of recovery and the technology that is required for its use. As such, phones that do not meet reuse criteria will continue to be sent for recycling.

Currently 4% of a given device sent for recycling is used for energy recovery. While our members continually look for ways to increase the percentage of a device that can be recycled, reclaimed or recovered, it is difficult to know how the current amount of product sent for energy recovery can be decreased.

Target: Reuse: Maintain the current diversion level from landfill of 100% for products that meet reuse criteria.

Target: Recycle: Maintain the current level of recycling, reclamation and recovery of 96% for wireless products entering the recycling process.

CWTA endeavours to work with its members to determine a methodology to report on the number of devices, based on the total recovered, that are sent for refurbishment/reuse and those sent for recycling.

- Quality of service
  - Indicator: Target community and program partner satisfaction.
  - Method to evaluate: Annual survey to gauge consumer awareness and satisfaction as well as the propensity to participate in a mobile device recycling program.

Target: 100% customer satisfaction with the Recycle My Cell program.

- Indicator: number and nature of complaints.
- Method to evaluate: Keeping logs of calls to toll-free number as well as keeping track of emails sent to [info@recyclemycell.ca](mailto:info@recyclemycell.ca) to determine the number of and nature of complaints received, as well as the number that are resolved/unresolved.

The number and nature of calls to the consumer toll-free number and written inquiries will be tracked.

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<sup>7</sup> As stated in the OES Final Revised (Phase 1 and 2) Waste Electrical and Electronic Equipment (WEEE) Program Plan (page 67): Reuse targets have not been established under other programs, and there is little reliable data to support the assumptions used to calculate these targets. Reuse and refurbishment organizations under the Program will report their activities in Year 1, which will allow OES to revisit these assumptions in future years.

The number and nature of complaints originating from Ontario, if any are received, will be monitored in order to ensure each is dealt with appropriately. A baseline for future targets will be established after the program has been operational in Ontario for a year.

For clarity, there are several challenges with respect to data collection that make the provision of accurate and complete wireless recycling data extremely difficult, including:

- Third-party collections (some of which are noted in *Appendix G*), including for-profit organizations as well not-for-profit organizations which constitute a large amount of product collected, where CWTA has little visibility or control over these collectors;
- Third-party reseller market;
- Consumer storage – although we have taken steps to gain insight into mobile device storage, it is difficult to gauge exactly how much product is currently being stored, as well as average storage duration;
- Import and export data – currently the *Canadian Border Security Agency* does not collect data for either import or export data and, in most cases, handset manufacturers and carriers do not have data available that would give province-specific data.

We are, however, committed to improving data collection and believe that there are opportunities to work with the province to do so. The members that operate recycling programs are currently examining their data collection methods to determine how they can improve data collection so that it will be more in-line with provincial requirements.

### **2.15.3 Reports**

CWTA will report annually on the volume of cellular devices collected by the program and will provide qualitative data on consumer trends, awareness and response to the program.

The volume of cellular devices collected will be reported in two parts: (1) a tally of devices dropped off at collection sites and (2) a detailed estimate of the number of mailed devices that originated from the province of Ontario.

Qualitative information will be provided through consumer surveys conducted via telephone. Consumer surveys will allow for comparative evaluation of the program from year one and beyond. It is the intent of CWTA to conduct similar surveys annually to determine the effectiveness of the program and ensure that attempts at increased consumer awareness are successful.

The performance indicators listed in Section 2.15.2 will also be reported in order to better evaluate the program's success.

## 2.16 Consultation

The CWTA consulted with relevant stakeholders in the development of Recycle My Cell, including the following organizations and groups:

- OES
- Recycling Council of Ontario (RCO)
- Ontario municipalities
  - Municipal Waste Association
  - Association of Municipalities of Ontario
- WDO, including the WDO Public Affairs Committee
- Ministry of Environment
- Environmental NGOs
  - Canadian Institute for Environmental Law and Policy
  - Clean Air Foundation
  - Citizen's Network on Waste Management
  - Ecojustice
  - Environmental Educators of Ontario
  - Hamilton Area Environmental Network
  - Ontario Environment Network
  - Pollution Probe
  - Sierra Club of Canada
  - Sustainability Network
  - Toronto Environmental Alliance
- General public

The consultation occurred via several formats between November 2009 and January 2010.

### Web Consultation:

- The Recycling Council of Ontario provided information concerning the Recycle My Cell plan consultation to their members via an established distribution list.
- Information concerning the consultation was forwarded to a list of participants identified by the WDO.
- The plan was also posted to the CWTA Web site for access by any interested party.

### Meetings:

- Members of the CWTA have participated in meetings with various stakeholders, namely the WDO (including the PAC), OES, RCO, and with interested members of the public.
- CWTA held 2 public consultation meetings in Ontario. A public face-to-face meeting was held in Toronto on December 14<sup>th</sup>. A web-based meeting was also held on December 15<sup>th</sup>. The public and impacted stakeholders were notified of the meetings through a media alert, as well notice was provided to the RCO for dissemination to its members.

- A summary of the comments raised at the public consultation meetings can be found in *Appendix H*. Comments raised as part of the WDO PAC meeting can be found in *Appendix I*.

Written Questions:

- Written questions were received from both WDO and the Rechargeable Battery Recycling Corporation of Canada (RBRCC). The letters, as well as the responses to their questions, can be found in *Appendices J* and *K* respectively.

CWTA would like to respectfully note several process concerns that were identified as a result of the consultation process:

- OES / Steward Edge: They indicated that if RMC is approved as the ISP they do not plan to collect cell phones through their collection network and will want to 'negotiate' an agreement that will include compensation for the time they spent developing their cell phone recycling plan.
- Ministry of Environment: Despite being included on the list of organizations that WDO directed CWTA to consult with, the Director of the Waste Diversion branch did not attend the meeting, as he is on the Board of WDO and felt he should maintain some distance from the consultation process.
- RCO: The Director of RCO indicated that she was uncomfortable providing comments given that she was on the Board of WDO, and on the ISP Committee that approved OES' cell phone plan, and that would be reviewing CWTA's plan.
- Ecojustice: Declined to participate citing resource constraints.
- Municipal Waste Association: Declined to participate indicating that they do not look at stewardship plans.

### 3. Comparison to OES Program Plan

CWTA's Recycle My Cell ISP provides a superior system for cell phone recycling to residents of Ontario. Unlike other programs approved to operate in the province, Recycle My Cell offers a free, convenient and established method for cell phone collection that is both efficient and proven to work. In addition, the targets that have been developed by the CWTA are based on actual experience garnered through several years of cell phone recycling.

Over 2006, 2007 and 2008 members of CWTA's recycling program collected **177.9430** tonnes of wireless devices across Canada. It is estimated **69.1252** of those tonnes were collected in Ontario.

Table 2 shows the differences between what CWTA and OES believe to be available for collection and also the differences in the respective collection targets.

**Table 2 CWTA and OES Collections/Targets (tonnes<sup>†</sup>)**

YEAR	CWTA Available for Collection <sup>T</sup>	CWTA Estimated Collection <sup>T</sup>	Collection Rate	OES available for Collection*	OES Collection Targets**	Collection Rate
2006	181	15	8%			
2007	203	27	13%			
2008	227	28	12%			
2009***	252	39	15%	558	167	30%
2010	277	60	22%	623	205	33%
2011	300	79	26%	699	252	36%
2012	323	99	31%	806	311	39%
2013	345	121	35%	926	386	42%
2014	369	144	39%	1085	479	44%

\* OES Final Revised (Phase 1 and 2) Waste Electrical and Electronic Equipment (WEEE) Program Plan – July 10, 2009 – Table 3.4

\*\* OES Final Revised (Phase 1 and 2) Waste Electrical and Electronic Equipment (WEEE) Program Plan – July 10, 2009 – Table 5.5

\*\*\* 2009 was noted as OES' baseline year (OES Final Revised (Phase 1 and 2) Waste Electrical and Electronic Equipment (WEEE) Program Plan – July 10, 2009 – Table 5.4) and is therefore used as the base year for comparative purposes.

† The average device weighs .2kg (OES Final Revised (Phase 1 and 2) Waste Electrical and Electronic Equipment (WEEE) Program Plan – July 10, 2009 – Table 3.2).

T CWTA Available for Collection and CWTA Estimated Collection data has changed from the plan submitted in November.

The CWTA estimates that 28 tonnes were collected in Ontario in 2008 and that approximately 39 tonnes of cell phones will be collected in 2009. This is an increase of 39% in one year. Although an increase of 39% seems rather high, CWTA believes this increase can be offset by a growing industry and an increase in consumer awareness.

OES, on the other hand, projects that 167 tonnes will be collected in 2009 (their baseline year) which is an increase of 328% over what CWTA projects will be collected in the same year. When compared to the CWTA estimate of 28 tonnes collected in 2008, the OES collection target of 167 tonnes in 2009 translates into an increase of 496% in one year.

It should be noted that OES' Ontario baseline collection target of 167 tonnes is almost as much as the combined national CWTA collection total for 2006, 2007 and 2008: 177.9430 tonnes.

CWTA understands that as per the existing regulatory framework, this ISP will be measured against the OES plan that was approved by MOE on August 14, 2009. CWTA's plan shares OES' objective of diverting as many cell phones from Ontario landfills as practical, in the shortest possible timeframe. CWTA's plan differs from OES' plan, however, in that it does not involve the charging of any fees to Ontario consumers, and employs a baseline that reflects accurate collection levels.



CWTA respectfully notes that it submitted detailed questions about numerous apparent discrepancies in the OES plan during the OES consultations process. While those questions were submitted fully five months ago, and despite having made several formal requests, CWTA has not received any explanation from OES as to these discrepancies. The CWTA's August 14<sup>th</sup> 2009 submission highlighting questions with respect to the OES plan is attached as *Appendix L, CWTA Comments re: Posting 010-7162 Review of the Waste Electrical and Electronic Equipment Program*.

After taking into consideration real collection data and the data derived from the Life Cycle Model CWTA can conclude that realistic and achievable targets have been established for the Recycle My Cell program.

#### **4. Conclusion**

Recycle My Cell will help minimize the introduction of mobile devices into the municipal waste stream, and thus the environmental effect of mobile device disposal, by promoting efficient collection, effective reuse strategies and responsible recycling and waste management.

The large number of collection points allows for a short commute for any consumer wishing to drop off a mobile device. Also, considering these points are primarily retail locations, consumers have the opportunity to drop off their devices when they purchase new ones, entirely eliminating the need for a trip to a separate collection point.

Advertising and public awareness campaigns will inform consumers of the options available to them through the Recycle My Cell program regarding the disposal of their unwanted devices.

Programs under the Recycle My Cell umbrella will only use recyclers that are appropriately certified, meaning they have an environmental management system in place which ensures accountability for their actions regarding the associated environmental impacts. Each company will also refurbish and resell the devices wherever possible, recycling the remaining non-repairable devices. This lowers demand for new devices and, in turn, lowers demand for the materials those new devices would consume.

The openness of the program will make it easy for new brands and companies to expand into Ontario as new participants are able to join this program at any time under appropriate terms and conditions. As well as continually expanding our brand coverage, regular monitoring of consumer awareness and reporting of collection figures will allow the program to further evolve as time goes on to ensure the changing needs of a stewardship plan are being met.

## Appendix A, Individual Program Details

Each sub-program of Recycle My Cell has the objective of maximizing the useful life of designated wireless material while minimizing the volume of material sent to landfill.

Consumers can return their used mobile devices purchased from any manufacturer to one of our listed national recycling program collection points across Canada. Types of collection points include carrier stores, participating retailers of all sorts, food banks and community centres. A variety of postage-paid mail-back options are also offered.

Collected units are sent to a central collection point that sorts the devices into reusable and recyclable categories. Following the sorting process, devices are sent to a certified downstream processor. Whenever possible, devices received are refurbished for resale and those that can't be refurbished are broken down into their components; 96% of the original input by weight is material destined for recycling, reclamation and recovery. Certified smelters assure optimum return from any remaining scrap products, as well as complete disposal of the material with little to zero impact on the environment.

A donation to participating charities is made for each device returned through the various carrier recycling programs.

Based on surveys, experience in other jurisdictions and anecdotal input, the industry exceeds any provincial expectations for waste diversion and is a leader in reuse and recycling. In 2006, 2007 and 2008, members of CWTA collected 187,824, 341,724 and 360,167 wireless units respectively. Specific to Ontario it is estimated that members of CWTA's recycling program have collected: **73,082** wireless devices in 2006; **132,691** wireless devices in 2007; and **139,853** wireless devices in 2008.

**Table 3 Program specifics for member initiatives**

	<b>Mobile Devices Recycled</b>	<b>Program Available in Ontario</b>	<b>Donation Method</b>	<b>Back-End Recycler and Certification</b>	<b>Devices Accepted</b>	<b>Charitable Contributions</b>
Bell: Blue Box	77,743 mobile devices recycled in 2008	Yes	Accepted at any Aliant or Bell store or any authorized Mobility dealer  Mail-back label available on website	ReCellular - OES certified through their association with Sims Recycling Solution	All mobile devices as defined by this program from any manufacturer or carrier	\$1 donated to WWF-Canada to help fight climate change for every mobile device
Motorola: Mobile Devices Takeback Program	8,198 mobile devices recycled in 2008	Yes	Mail-back label available on website	Global Electric Electronic Processing Inc. (GEEP) - OES certified	All mobile devices as defined by this program from any manufacturer or carrier	N/A
Rogers: Phones for Food	146,111 mobile devices recycled in 2008	Yes	Accepted at participating Phones for Food locations and through postage paid mail-back bag included with purchase of Rogers devices	ReCellular - OES certified through their association with Sims Recycling Solution	All mobile devices as defined by this program from any manufacturer or carrier	Funds raised are donated to local food banks
TBayTel	Approximately 970 mobile devices recycled in 2008	Yes	Accepted at the Victoriaville Civic Centre or Canada Games Complex or participating TBayTel Mobility locations	GREENTEC - OES certified as collector and consolidator; have started certification process as processor.	All mobile devices as defined by this program from any manufacturer or carrier	Funds raised are used by P.R.O. Kids to fund community-based recreational activities for kids in need
TELUS: Return & Recycle	86,645 mobile devices recycled in 2008	Yes	Accepted at any TELUS Mobility store or participating dealer location	Global Electric Electronic Processing Inc. (GEEP) - OES certified	All mobile devices as defined by this program from any manufacturer or carrier	Through Tree Canada, a tree is planted for every device collected
Virgin Mobile Canada: Red is the New Green	Program launched on October 5, 2009.	Yes	Accepted at any Virgin Mobile location in Canada	Sims Recycling Solutions - OES certified	All mobile devices as defined by this program from any manufacturer or carrier	N/A
MTS	6,600 mobile devices recycled in 2008	No	Accepted at any MTS Connect store or MTS dealers	GREENTEC - OES certified as collector and consolidator; have started certification process as processor.	All mobile devices as defined by this program from any manufacturer or carrier	Proceeds from returned devices are donated to Resource Conservation Manitoba
SaskTel: Phones for a Fresh Start	Approximately 3,900 mobile devices recycled in 2008	No	Accepted at any SaskTel store or participating dealer locations	ReCellular - OES certified through their association with Sims Recycling Solution	All mobile devices as defined by this program from any manufacturer or carrier	Funds raised will be used to purchase pre-paid phone cards to donate to the Provincial Association of Transition Houses and Services of Saskatchewan (PATHS).
Videotron - Allo la Terre	30,000 mobile devices recycled in 2008	No	Accepted at any Le SuperClub Videotron stores, Videotron stores and counters, or Archambault stores in Quebec	FCM Recycling Inc. - OES certified	All mobile devices as defined by this program from any manufacturer or carrier	All profits from the sale and recycling of the phones go to support Earth Day Québec's green belt projects, which help preserve biodiversity by reconnecting natural habitats.

## **A.1 Bell – Blue Box**

Bell's *Blue Box* program was initially launched in 2003 and since then, more than 500,000 devices and more than 80 metric tons of batteries and accessories have been diverted from landfill.

Consumers can return their used mobile devices from all manufacturers to any *Bell* store, any authorized *Mobility* dealer and by mail through Bell.ca. In turn Bell will donate \$1 to *WWF-Canada*, the global conservation organization, for each unit collected. Donations help *WWF-Canada* to fight climate change. Consumers can also ship their device by *Canada Post*, free of charge or bring devices to a participating *Caisse Desjardins*.

Recovered devices are reused or recycled. About half of the devices can still be refurbished and reused. The remaining devices will be recycled in Canada in compliance with Canadian regulations.

Bell is a member of the *UNEP Basel Convention MPPI*, an industry pilot project on the environmentally sound management of end-of-life mobile devices. Members of the working groups address issues such as refurbishment of used mobile devices, collection and trans-boundary movement, material recovery and recycling. In addition, members consider future improvements in device design in order to further reduce waste to landfill.

Bell's *Blue Box* program also recycles all mobile device accessories and batteries. All data on the returned devices is deleted.

This simple action goes a long way to help protect the environment. It prevents electronic waste, the fastest-growing form of waste in the country, from ending up in landfill sites.

In 2006, the Bell *Blue Box* program was awarded the prestigious "*Retail Corporate Social Responsibility Initiative Award*" by the Retail Council of Canada.

In 2008, the Bell *Blue Box* program was awarded the Phénix environmental award, in the category of *Réalisation-Entreprise* (Achievement-Corporation) from Quebec's Environment and Economic ministries.

## **A.2 Motorola – Mobile Devices Takeback Program**

Motorola is a strong proponent and supporter of environmental sustainability and recycling programs. In partnership with carriers, customers, retailers and recyclers, they operate or participate in take back programs across the globe. Motorola Canada offers a prepaid label for the return of mobile phones and accessories by mail. All brands of mobile phones and accessories will be accepted.

### **A.3 Rogers Communications Inc. – Phones for Food**

The award-winning Phones for Food program began in 2003 in order to alleviate hunger and divert waste from landfill sites. Rogers Wireless became the official Wireless Sponsor of the program in 2004.

Phones for Food is the first national program of its kind in Canada. It raises funds for food banks, diverts waste from landfills, and provides public education on these issues. One mobile device, depending on its age and condition, can be worth up to \$5 when donated, which is equivalent to a jar of peanut butter, one carton of milk or even an entire meal.

Through the program consumers can donate used mobile devices by dropping them off at Rogers and Fido branded retail stores, or via a postage-paid recycling bag included with all new Rogers and Fido devices. In fact, Rogers is the only carrier in North America to offer the bag in box program. Devices collected are sent to a central location, sorted, and either sold to the remanufacturing industry, then refurbished for consumers or recycled responsibly. Funds raised as a result are donated to local food banks.

Over \$650,000 has been generated for food banks across the country to-date, and over 450,000 devices have been diverted from landfill.

In early 2008, 45 high schools across Canada collected over 18,500 devices in the inaugural Rogers Phones for Food High School Challenge. In the future Rogers hopes to expand this program to include more schools across Canada; in turn collecting more devices and helping more food banks.

### **A.4 TBayTel**

Consumers can donate used mobile devices through participating TBayTel dealer store locations. Funds from all collected phones are provided to P.R.O Kids, a service of the City of Thunder Bay Recreation & Culture Division, to support their fundraising initiatives.

### **A.5 TELUS – Return & Recycle**

TELUS introduced their *Return & Recycle* program in June 2005 to collect mobile handsets and accessories for recycling. The goal of the program is to divert as many devices and accessories possible from Canadian landfills. This ensures that the hazardous components of mobile devices are disposed of in a responsible manner.

TELUS is continuing to enhance its environmental stewardship through a partnership with *Tree Canada*. TELUS, through *Tree Canada*, will plant a tree for each handset collected through the Return & Recycle Program.

How the program works

1. Handset(s), 2Wire Gateway surge protectors (Alberta & BC clients only) and/or accessories are brought to one of TELUS' locations.
2. The devices are shipped to a facilitation centre, where they are sorted and counted.
3. The items are then sent to a third party recycling vendor, who will recycle the devices responsibly.

The program is free for everyone, and TELUS accepts all kinds of mobile devices, including cellular phones, smartphones, and air cards, as well as batteries and accessories, irrespective of age, condition, where they were purchased or the network on which they were operating.

In the Western Canada region, 10,000 trees were planted in Kamloops, B.C., for reforestation efforts following the loss of conifers to mountain pine beetles.

#### **A.6 Virgin Mobile Canada – Red is the New Green**

Virgin Mobile Canada encourages consumers to do something good for the planet by recycling their old mobile phones.

Consumers can simply hand in any unused or unwanted mobile phones and accessories by dropping them off with a sales associate or depositing them in the drop box at any Virgin Mobile branded retail location across Canada. Devices collected are sent to a central location, sorted, and then sent for responsible recycling.

#### **A.7 MTS**

Prior to 2005, MTS in Manitoba recycled mobile devices and accessories internally. In 2004, 300 kg of mobile devices and accessories were recycled.

In 2005, MTS kicked off a provincial recycling program for mobile devices. Under the new program, used mobile devices and accessories dropped off in specially-marked bins at any Manitoba *MTS Connect* store and *MTS* dealer were recycled through GREENTEC with all proceeds donated directly to Mike Komenda Skateboard Park.

In 2009, money collected from the cell phone collection recycling program will be donated to Resource Conservation Manitoba (RCM). Resource Conservation Manitoba is a non-profit, non-governmental centre for environmental education and applied sustainability.

The mobile devices and accessories gathered by MTS through this program are delivered to an equipment recycling company called GREENTEC, which dismantles used mobile devices and sorts the pieces into re-usable parts. Any pieces that can't be refurbished are broken down and made into other products. GREENTEC operates *Think Recycle*, an environmental fundraising program that offers payment for recycled mobile devices and also plants 1 tree for every 24 donated mobile devices.

## **A.8 SaskTel – Phones for a Fresh Start**

The SaskTel *Phones for a Fresh Start* Recycling Program is an environmental initiative to help divert hazardous materials from landfills. Recycling old cell phones, PDAs, cell phone batteries, chargers, or other accessories recovers valuable materials and reduces energy consumption and greenhouse gas emissions.

Collection bins will be set up in all SaskTel stores as well as participating dealers. If the customer cannot make it to one of the drop off locations they can simply take the phone/item being recycled to a Canada Post outlet and the Post Master will ship it to SaskTel via Priority Post Courier at no charge.

Once collected, the devices will be shipped to ReCellular where they will be recycled or re-used, meaning their life cycle will continue long after a last call has been made.

Any proceeds from the recycling process are then used to support a SaskTel community partnership, aiding victims of domestic abuse. With the funds raised from the sale of the refurbished phones, SaskTel will purchase pre-paid phone cards to donate to the Provincial Association of Transition Houses and Services of Saskatchewan (PATHS).

This is a free program for the general public where they can return their unwanted cell phones and accessories, contribute to a good cause and help to preserve the world around us.

## **A.9 Videotron – Allo la Terre**

Videotron, as part of its parent company Quebecor, is a major partner of Earth Day Québec an organization that encourages people to take action to save the environment.

The “Allo la Terre” program, introduced in 2008, allows consumers to donate used mobile devices, regardless of make or model, by dropping them off at any Le SuperClub Vidéotron stores, Videotron stores and counters, or Archambault stores in Quebec.

“Allo la Terre” has recovered more than 30,000 cell phones in under a year, making it one of the most successful recovery programs in Canada. All profits from the sale and recycling of the phones go to support Earth Day Québec's green belt projects, which help preserve biodiversity by reconnecting natural habitats.

## Appendix B, Agency Appointment Letter Sample

[Date]

Glenda Gies  
Executive Director  
Waste Diversion Ontario,  
4711 Yonge Street, Suite 1102,  
Toronto, ON M2N 6K8

Dear Ms Gies:

**Re:** Exemption from the Industry Funding Organization's Rules for Stewards per Section 34(6) of the Waste Diversion Act (WDA).

This letter is to advise Waste Diversion Ontario that [Company Name] are stewards as defined by Ontario Electronic Stewardship, the industry funding organization for designated WEEE. Section 34(6) of the WDA regulation states that:

***Exemption from stewardship fees***

*34(6) Subsection 31(1) does not apply to a person who is designated under the rules made by an industry funding organization as a steward in respect of a designated waste if a plan that relates to the designated waste is approved under this section and,*

*(a) the plan was approved on the application of the person; or*

*(b) the person is required by a contract to participate in the plan and is a member of a class of persons described in the plan as a participant of the plan.*

As the Canadian Wireless Telecommunications Association (CWTA) represents both carriers and manufacturers, and as the CWTA manages the Recycle My Cell program as an approved Industry Stewardship Plan in Ontario, [Company Name] are participants of the plan and are therefore exempt from stewardship fees.

Sincerely,



## Appendix C, Drop-off Locations

<b>Community</b>	<b>Store Name</b>	<b>Carrier/Program</b>
AJAX	Rogers Wireless	Rogers Wireless
AJAX	Rogers Wireless	Rogers Wireless
AJAX	Rogers Plus	Rogers Wireless
AJAX	Bell	Bell Mobility
AJAX	Excell Communications	Bell Mobility
AJAX	TELUS Store	TELUS
AJAX	Rogers Plus	Rogers Wireless
ALLISTON	Bell	Bell Mobility
ALLISTON	TELUS Store	TELUS
ANCASTER	Bell	Bell Mobility
ANCASTER	TELUS Store	TELUS
ANCASTER	Nexstar Communications	TELUS Dealer
ANCASTER	Rogers Plus	Rogers Wireless
ANCASTER	Fido	Rogers Wireless
ARNPRIOR	Priority Business	Bell Mobility
AURORA	Rogers Wireless	Rogers Wireless
AURORA	Rogers Plus	Rogers Wireless
AURORA	Bell	Bell Mobility
AURORA	TELUS Store	TELUS
AURORA	York Wireless Solutions	TELUS Dealer
AURORA	Rogers Plus	Rogers Wireless
BARRHAVEN	Rogers Plus	Rogers Wireless
BARRIE	Rogers Wireless	Rogers Wireless
BARRIE	Rogers Wireless	Rogers Wireless
BARRIE	Rogers Wireless	Rogers Wireless
BARRIE	Rogers Wireless	Rogers Wireless
BARRIE	Fido	Rogers Wireless
BARRIE	Rogers Plus	Rogers Wireless
BARRIE	Rogers Plus	Rogers Wireless
BARRIE	Bell	Bell Mobility
BARRIE	Bell	Bell Mobility
BARRIE	Bell	Bell Mobility
BARRIE	Bell	Bell Mobility
BARRIE	TELUS Store	TELUS
BARRIE	Compu-SOLVE Technologies Inc.	TELUS Dealer
BARRIE	Aztech Communications	TELUS Dealer
BARRIE	Wise Advantage Inc.	TELUS Dealer
BARRIE	Telequip Systems Limited	TELUS Dealer
BARRIE	Point To Point Communications Ltd.	TELUS Dealer
BARRIE	Rogers Plus	Rogers Wireless
BARRIE	Rogers Wireless	Rogers Wireless
BARRIE	Virgin Mobile Store	Virgin Mobile
BEAMSVILLE	Active Wireless Inc.	TELUS Dealer
BELLEVILLE	Rogers Wireless	Rogers Wireless
BELLEVILLE	Rogers Plus	Rogers Wireless

BELLEVILLE	Bell	Bell Mobility
BELLEVILLE	TAS Quinte Communications	Bell Mobility
BELLEVILLE	TELUS Store	TELUS
BELLEVILLE	Tyroute Communications Inc.	TELUS Dealer
BELLEVILLE	Rogers Plus	Rogers Wireless
BELLEVILLE	Virgin Mobile Store	Virgin Mobile
BOLTON	Rogers Wireless	Rogers Wireless
BOLTON	Bell	Bell Mobility
BOLTON	Clearly Mobile	TELUS Dealer
BOWMANVILLE	Bell	Bell Mobility
BOWMANVILLE	TELUS Store	TELUS
BRACEBRIDGE	Rogers Wireless	Rogers Wireless
BRACEBRIDGE	Bell	Bell Mobility
BRACEBRIDGE	TELUS Store	TELUS
BRACEBRIDGE	Rogers Plus	Rogers Wireless
BRAMALEA	Bell	Bell Mobility
BRAMPTON	Rogers Wireless	Rogers Wireless
BRAMPTON	Rogers Wireless	Rogers Wireless
BRAMPTON	Rogers Wireless	Rogers Wireless
BRAMPTON	Rogers Wireless	Rogers Wireless
BRAMPTON	Fido	Rogers Wireless
BRAMPTON	Fido	Rogers Wireless
BRAMPTON	Rogers Plus	Rogers Wireless
BRAMPTON	Rogers Plus	Rogers Wireless
BRAMPTON	Rogers Plus	Rogers Wireless
BRAMPTON	Bell	Bell Mobility
BRAMPTON	Bell	Bell Mobility
BRAMPTON	Skylar Mobile Telecom	Bell Mobility
BRAMPTON	Bell	Bell Mobility
BRAMPTON	TELUS Store	TELUS
BRAMPTON	TELUS Store	TELUS
BRAMPTON	In Touch Mobility Ltd.	TELUS Dealer
BRAMPTON	Clearly Mobile	TELUS Dealer
BRAMPTON	Pagetron Communication Inc.	TELUS Dealer
BRAMPTON	Pagetron Communication Inc.	TELUS Dealer
BRAMPTON	Lawson & Lawson	TELUS Dealer
BRAMPTON	Economic Development Office	Dropbox
BRAMPTON	Rogers Plus	Rogers Wireless
BRAMPTON	Virgin Mobile Store	Virgin Mobile
BRANTFORD	Rogers Wireless	Rogers Wireless
BRANTFORD	Rogers Wireless	Rogers Wireless
BRANTFORD	Rogers Plus	Rogers Wireless
BRANTFORD	Rogers Plus	Rogers Wireless
BRANTFORD	Bell	Bell Mobility
BRANTFORD	Bell	Bell Mobility
BRANTFORD	Bell	Bell Mobility
BRANTFORD	TELUS Store	TELUS
BRANTFORD	Nexstar Communications	TELUS Dealer
BRANTFORD	Primeline Connections	TELUS Dealer
BRANTFORD	Fido	Rogers Wireless

BRANTFORD	Virgin Mobile Store	Virgin Mobile
BROCKVILLE	Bell	Bell Mobility
BROCKVILLE	Marks Stereo Centre	Bell Mobility
BROCKVILLE	Tyroute Communications Inc.	TELUS Dealer
BROOKLIN	Rogers Wireless	Rogers Wireless
BURLINGTON	Rogers Wireless	Rogers Wireless
BURLINGTON	Rogers Wireless	Rogers Wireless
BURLINGTON	Rogers Wireless	Rogers Wireless
BURLINGTON	Fido	Rogers Wireless
BURLINGTON	Bell	Bell Mobility
BURLINGTON	Bell	Bell Mobility
BURLINGTON	Bell	Bell Mobility
BURLINGTON	Bell	Bell Mobility
BURLINGTON	TELUS Store	TELUS
BURLINGTON	TELUS Store	TELUS
BURLINGTON	Peerless Connections Inc.	TELUS Dealer
BURLINGTON	C & I Technologies Inc.	TELUS Dealer
BURLINGTON	Primeline Connections	TELUS Dealer
BURLINGTON	Rogers Plus	Rogers Wireless
BURLINGTON	Rogers Plus	Rogers Wireless
BURLINGTON	Rogers Plus	Rogers Wireless
BURLINGTON	Rogers Wireless	Rogers Wireless
BURLINGTON	Fido	Rogers Wireless
CALEDONIA	Caledonia Wireless Inc.	TELUS Dealer
CALEDONIA	Caledonia Wireless Inc.	TELUS Dealer
CAMBRIDGE	Rogers Wireless	Rogers Wireless
CAMBRIDGE	Fido	Rogers Wireless
CAMBRIDGE	Rogers Plus	Rogers Wireless
CAMBRIDGE	Rogers Plus	Rogers Wireless
CAMBRIDGE	Bell	Bell Mobility
CAMBRIDGE	Bell	Bell Mobility
CAMBRIDGE	TELUS Store	TELUS
CAMBRIDGE	TELUS Store	TELUS
CAMBRIDGE	Rogers Plus	Rogers Wireless
CAMBRIDGE	Virgin Mobile Store	Virgin Mobile
CHATHAM	Rogers Wireless	Rogers Wireless
CHATHAM	Rogers Plus	Rogers Wireless
CHATHAM	Bell	Bell Mobility
CHATHAM	VAN Communications	Bell Mobility
CHATHAM	Bell	Bell Mobility
CHATHAM	TELUS Store	TELUS
CHATHAM	Kelcom	TELUS Dealer
CHATHAM	Virgin Mobile Store	Virgin Mobile
CLIFFORD	Wightman Communications	Bell Mobility
COBOURG	Rogers Wireless	Rogers Wireless
COBOURG	Bell	Bell Mobility
COBOURG	EAGLE.CA	TELUS Dealer
COCHRANE	NTL Mobility Dealer	NTL/Telebec
COLLINGWOOD	Rogers Wireless	Rogers Wireless
COLLINGWOOD	Bell	Bell Mobility

COLLINGWOOD	Aztech Communications	TELUS Dealer
COLLINGWOOD	Rogers Plus	Rogers Wireless
CONCORD	Rogers Plus	Rogers Wireless
CONCORD	Wireless Systems Solutions Inc.	TELUS Dealer
CONCORD	Canadian Mobile Systems Inc.	TELUS Dealer
COOKSTOWN	Rogers Wireless	Rogers Wireless
CORNWALL	Rogers Wireless	Rogers Wireless
CORNWALL	Bell	Bell Mobility
CORNWALL	TELUS Store	TELUS
CORNWALL	Freedom Wireless	TELUS Dealer
CORNWALL	Virgin Mobile Store	Virgin Mobile
COURTICE	Rogers Plus	Rogers Wireless
COURTICE	Go Wireless Inc.	TELUS Dealer
DOWNSVIEW	Rogers Wireless	Rogers Wireless
DOWNSVIEW	Alcom Enterprises Inc.	TELUS Dealer
DUNDAS	Mobile Communication Services	TELUS Dealer
ESPANOLA	Paul s Communication	Bell Mobility
ETOBICOKE	Rogers Wireless	Rogers Wireless
ETOBICOKE	Rogers Wireless	Rogers Wireless
ETOBICOKE	Rogers Wireless	Rogers Wireless
ETOBICOKE	Rogers Wireless	Rogers Wireless
ETOBICOKE	Rogers Wireless	Rogers Wireless
ETOBICOKE	Fido	Rogers Wireless
ETOBICOKE	Fido	Rogers Wireless
ETOBICOKE	Rogers Plus	Rogers Wireless
ETOBICOKE	Rogers Plus	Rogers Wireless
ETOBICOKE	Rogers Plus	Rogers Wireless
ETOBICOKE	Baka Wireless	Rogers Wireless
ETOBICOKE	Bell	Bell Mobility
ETOBICOKE	Bell	Bell Mobility
ETOBICOKE	Bell	Bell Mobility
ETOBICOKE	Bell	Bell Mobility
ETOBICOKE	Bell	Bell Mobility
ETOBICOKE	Bell (Kiosk)	Bell Mobility
ETOBICOKE	TELUS Store	TELUS
ETOBICOKE	360 DOTCONNECT	TELUS Dealer
ETOBICOKE	Hotwire Communications	TELUS Dealer
ETOBICOKE	NeoCell Wireless	TELUS Dealer
ETOBICOKE	Rogers Plus	Rogers Wireless
FERGUS	Your Choice Personal Communications	Bell Mobility
FONTHILL	CELLULARWORX	TELUS Dealer
FORT ERIE	Rogers Wireless	Rogers Wireless
FORT ERIE	Bell	Bell Mobility
FORT ERIE	Performance Wireless	TELUS Dealer
GEORGETOWN	Rogers Wireless	Rogers Wireless
GEORGETOWN	Bell	Bell Mobility
GEORGETOWN	Rogers Plus	Rogers Wireless
GLOUCESTER	Rogers Wireless	Rogers Wireless
GLOUCESTER	Rogers Plus	Rogers Wireless
GODERICH	Rogers Wireless	Rogers Wireless
GODERICH	Bell	Bell Mobility

GODERICH	Bluewater Office Equipment Ltd.	TELUS Dealer
GRIMSBY	Mobile Communication Services	TELUS Dealer
GUELPH	Rogers Wireless	Rogers Wireless
GUELPH	Fido	Rogers Wireless
GUELPH	Rogers Plus	Rogers Wireless
GUELPH	Bell	Bell Mobility
GUELPH	Bell	Bell Mobility
GUELPH	Bell	Bell Mobility
GUELPH	TELUS Store	TELUS
GUELPH	C & I Technologies Inc.	TELUS Dealer
GUELPH	Rogers Plus	Rogers Wireless
GUELPH	Rogers Plus	Rogers Wireless
GUELPH	Virgin Mobile Store	Virgin Mobile
HAMILTON	Rogers Wireless	Rogers Wireless
HAMILTON	Rogers Wireless	Rogers Wireless
HAMILTON	Fido	Rogers Wireless
HAMILTON	Bell	Bell Mobility
HAMILTON	Bell	Bell Mobility
HAMILTON	Bell	Bell Mobility
HAMILTON	Teletron Communications Inc.	Bell Mobility
HAMILTON	Bell (Kiosk)	Bell Mobility
HAMILTON	Bell	Bell Mobility
HAMILTON	TELUS Store	TELUS
HAMILTON	Suntel Mobility Inc.	TELUS Dealer
HAMILTON	Active Wireless Inc.	TELUS Dealer
HAMILTON	Mobile Communication Services	TELUS Dealer
HAMILTON	Mobile Communication Services	TELUS Dealer
HAMILTON	Rogers Plus	Rogers Wireless
HAMILTON	Rogers Plus	Rogers Wireless
HAMILTON	Rogers Plus	Rogers Wireless
HAMILTON	Rogers Plus	Rogers Wireless
HAMILTON	Fido	Rogers Wireless
HAMILTON	Virgin Mobile Store	Virgin Mobile
HAMILTON	Virgin Mobile Store	Virgin Mobile
HANOVER	Bell	Bell Mobility
HAWKESBURY	Freedom Wireless	TELUS Dealer
HAWKESBURY	Le SuperClub Vidéotron	Vidéotron
HEARST	NTL Mobility Dealer	NTL/Telebec
HUNTSVILLE	Rogers Wireless	Rogers Wireless
HUNTSVILLE	Bell	Bell Mobility
HUNTSVILLE	TELUS Store	TELUS
IROQUOIS FALLS	NTL Mobility Dealer	NTL/Telebec
KANATA	Rogers Wireless	Rogers Wireless
KANATA	Rogers Wireless	Rogers Wireless
KANATA	Rogers Plus	Rogers Wireless
KANATA	Bell	Bell Mobility
KANATA	TELUS Store	TELUS
KANATA	Rogers Plus	Rogers Wireless
KAPUSKASING	NTL Mobility Dealer	NTL/Telebec
KAPUSKASING	NTL Mobility Dealer	NTL/Telebec

KAPUSKASING	Office Pro	TELUS Dealer
KESWICK	Bell	Bell Mobility
KINCARDINE	Rogers Wireless	Rogers Wireless
KINGSTON	Rogers Wireless	Rogers Wireless
KINGSTON	Rogers Wireless	Rogers Wireless
KINGSTON	Rogers Wireless	Rogers Wireless
KINGSTON	Bell	Bell Mobility
KINGSTON	Bell	Bell Mobility
KINGSTON	Bell	Bell Mobility
KINGSTON	TELUS Store	TELUS
KINGSTON	Tyroute Communications Inc.	TELUS Dealer
KINGSTON	Tyroute Communications Inc.	TELUS Dealer
KINGSTON	Tyroute Communications Inc.	TELUS Dealer
KINGSTON	Virgin Mobile Store	Virgin Mobile
KIRKLAND LAKE	NTL Mobility Dealer	NTL/Telebec
KITCHENER	Rogers Wireless	Rogers Wireless
KITCHENER	Rogers Wireless	Rogers Wireless
KITCHENER	Rogers Wireless	Rogers Wireless
KITCHENER	Fido	Rogers Wireless
KITCHENER	Rogers Plus	Rogers Wireless
KITCHENER	Rogers Plus	Rogers Wireless
KITCHENER	Rogers Plus	Rogers Wireless
KITCHENER	Bell	Bell Mobility
KITCHENER	Bell	Bell Mobility
KITCHENER	Bell	Bell Mobility
KITCHENER	Bell	Bell Mobility
KITCHENER	BAKA Communications	Bell Mobility
KITCHENER	TELUS Store	Bell Mobility
KITCHENER	C & I Technologies Inc.	TELUS
KITCHENER	Rogers Plus	TELUS Dealer
KITCHENER	Rogers Plus	Rogers Wireless
KITCHENER	Rogers Plus	Rogers Wireless
KITCHENER	Virgin Mobile Store	Virgin Mobile
LASALLE	Rogers Wireless	Rogers Wireless
LASALLE	Kelcom	Rogers Wireless
LEAMINGTON	Rogers Wireless	TELUS Dealer
LEAMINGTON	Bell	Rogers Wireless
LEAMINGTON	Kelcom	Bell Mobility
LINCOLN	In Touch Communications	TELUS Dealer
LINDSAY	Rogers Wireless	Bell Mobility
LINDSAY	Bell	Rogers Wireless
LINDSAY	Bell	Bell Mobility
LINDSAY	Primeline Connections	Bell Mobility
LISTOWEL	Rogers Wireless	TELUS Dealer
LISTOWEL	TELUS Store	TELUS
LONDON	Rogers Wireless	Rogers Wireless
LONDON	Rogers Wireless	Rogers Wireless
LONDON	Rogers Wireless	Rogers Wireless
LONDON	Rogers Wireless	Rogers Wireless
LONDON	Fido	Rogers Wireless

LONDON	Fido	Rogers Wireless
LONDON	Rogers Plus	Rogers Wireless
LONDON	Rogers Plus	Rogers Wireless
LONDON	Rogers Plus	Rogers Wireless
LONDON	Rogers Plus	Rogers Wireless
LONDON	Rogers Plus	Rogers Wireless
LONDON	Bell	Bell Mobility
LONDON	Bell	Bell Mobility
LONDON	Bell	Bell Mobility
LONDON	Bell	Bell Mobility
LONDON	Bell	Bell Mobility
LONDON	TELUS Store	TELUS
LONDON	TELUS Store	TELUS
LONDON	TELUS Store	TELUS
LONDON	TELUS Store	TELUS
LONDON	Empire Wireless Products Inc.	TELUS Dealer
LONDON	PROwireless	TELUS Dealer
LONDON	Kelcom	TELUS Dealer
LONDON	Rogers Plus	Rogers Wireless
LONDON	Rogers Plus	Rogers Wireless
LONDON	Rogers Plus	Rogers Wireless
LONDON	Rogers Plus	Rogers Wireless
LONDON	Rogers Plus	Rogers Wireless
LONDON	Rogers Wireless	Rogers Wireless
LONDON	Rogers Wireless	Rogers Wireless
LONDON	Rogers Wireless	Rogers Wireless
LONDON	Fido	Rogers Wireless
LONDON	Virgin Mobile Store	Virgin Mobile
LONDON	Virgin Mobile Store	Virgin Mobile
MAPLE	Rogers Wireless	Rogers Wireless
MAPLE	Bell	Bell Mobility
MAPLE	All Way Wireless Communications Inc.	TELUS Dealer
MARKHAM	Rogers Wireless	Rogers Wireless
MARKHAM	Rogers Wireless	Rogers Wireless
MARKHAM	Rogers Wireless	Rogers Wireless
MARKHAM	Rogers Wireless	Rogers Wireless
MARKHAM	Rogers Wireless	Rogers Wireless
MARKHAM	Rogers Wireless	Rogers Wireless
MARKHAM	Rogers Wireless	Rogers Wireless
MARKHAM	Fido	Rogers Wireless
MARKHAM	Rogers Plus	Rogers Wireless
MARKHAM	Rogers Plus	Rogers Wireless
MARKHAM	Bell	Bell Mobility
MARKHAM	Bell	Bell Mobility
MARKHAM	Bell	Bell Mobility
MARKHAM	Bell	Bell Mobility
MARKHAM	TELUS Store	TELUS
MARKHAM	Cellular Battery Corp.	TELUS Dealer
MARKHAM	Go Wireless Inc.	TELUS Dealer
MARKHAM	Rogers Plus	Rogers Wireless

MARKHAM	Fido	Rogers Wireless
MARKHAM	Fido	Rogers Wireless
MARKHAM	Fido	Rogers Wireless
MARKHAM	Fido	Rogers Wireless
MARKHAM	Fido	Rogers Wireless
MARKHAM	Fido	Rogers Wireless
MARKHAM	Virgin Mobile Store	Virgin Mobile
MATHESON	NTL Mobility Dealer	NTL/Telebec
MIDLAND	Rogers Plus	Rogers Wireless
MIDLAND	Bell	Bell Mobility
MIDLAND	Compu-SOLVE Technologies Inc.	TELUS Dealer
MILTON	Rogers Wireless	Rogers Wireless
MILTON	Bell	Bell Mobility
MILTON	TELUS Store	TELUS
MILTON	Communication Zone Inc.	TELUS Dealer
MILTON	Rogers Plus	Rogers Wireless
MISSISSAUGA	Rogers Wireless	Rogers Wireless
MISSISSAUGA	Rogers Wireless	Rogers Wireless
MISSISSAUGA	Rogers Wireless	Rogers Wireless
MISSISSAUGA	Rogers Wireless	Rogers Wireless
MISSISSAUGA	Rogers Wireless	Rogers Wireless
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MISSISSAUGA	Rogers Wireless	Rogers Wireless
MISSISSAUGA	Rogers Wireless	Rogers Wireless
MISSISSAUGA	Rogers Wireless	Rogers Wireless
MISSISSAUGA	Rogers Wireless	Rogers Wireless
MISSISSAUGA	Rogers Wireless	Rogers Wireless
MISSISSAUGA	Fido	Rogers Wireless
MISSISSAUGA	Fido	Rogers Wireless
MISSISSAUGA	Rogers Plus	Rogers Wireless
MISSISSAUGA	Rogers Plus	Rogers Wireless
MISSISSAUGA	Rogers Plus	Rogers Wireless
MISSISSAUGA	Rogers Plus	Rogers Wireless
MISSISSAUGA	Rogers Plus	Rogers Wireless
MISSISSAUGA	Bell	Bell Mobility
MISSISSAUGA	Bell	Bell Mobility
MISSISSAUGA	Bell	Bell Mobility
MISSISSAUGA	Bell	Bell Mobility
MISSISSAUGA	Bell	Bell Mobility
MISSISSAUGA	Bell	Bell Mobility
MISSISSAUGA	Bell	Bell Mobility
MISSISSAUGA	Bell	Bell Mobility
MISSISSAUGA	Bell	Bell Mobility
MISSISSAUGA	NATEL Communications	Bell Mobility
MISSISSAUGA	Baka Communications	Bell Mobility
MISSISSAUGA	TELUS Store	TELUS
MISSISSAUGA	TELUS Store	TELUS



MISSISSAUGA	TELUS Store	TELUS
MISSISSAUGA	TELUS Store	TELUS
MISSISSAUGA	TELUS Store	TELUS
MISSISSAUGA	Connect-Us Inc.	TELUS Dealer
MISSISSAUGA	Ideal Communications	TELUS Dealer
MISSISSAUGA	In Touch Mobility Ltd.	TELUS Dealer
MISSISSAUGA	JC Communication Inc.	TELUS Dealer
MISSISSAUGA	Hotwire Communications	TELUS Dealer
MISSISSAUGA	Cellular Max Communications Inc.	TELUS Dealer
MISSISSAUGA	Fox Wireless Communications Inc.	TELUS Dealer
MISSISSAUGA	New Page Telecommunication Inc.	TELUS Dealer
MISSISSAUGA	ATG Communications Group Inc.	TELUS Dealer
MISSISSAUGA	Ontario Wireless	TELUS Dealer
MISSISSAUGA	Pagetron Communication Inc.	TELUS Dealer
MISSISSAUGA	Rogers Plus	Rogers Wireless
MISSISSAUGA	Rogers Wireless	Rogers Wireless
MISSISSAUGA	Fido	Rogers Wireless
MISSISSAUGA	Virgin Mobile Store	Virgin Mobile
MISSISSAUGA	Virgin Mobile Store	Virgin Mobile
MITCHELL	Rogers Wireless	Rogers Wireless
NEPEAN	Fido	Rogers Wireless
NEPEAN	Rogers Plus	Rogers Wireless
NEPEAN	Rogers Plus	Rogers Wireless
NEPEAN	Bell	Bell Mobility
NEPEAN	Bell	Bell Mobility
NEPEAN	Bell	Bell Mobility
NEPEAN	TELUS Store	TELUS
NEPEAN	TELUS Store	TELUS
NEPEAN	Wirelesstore	TELUS Dealer
NEPEAN	Rogers Plus	Rogers Wireless
NEW LISKEARD	NTL Mobility Dealer	NTL/Telebec
NEW LISKEARD	NTL Mobility Dealer	NTL/Telebec
NEW LISKEARD	GO 2 JO MOBILITY	TELUS Dealer
NEWBURY	Rogers Wireless	Rogers Wireless
NEWMARKET	Rogers Wireless	Rogers Wireless
NEWMARKET	Fido	Rogers Wireless
NEWMARKET	Rogers Plus	Rogers Wireless
NEWMARKET	Rogers Plus	Rogers Wireless
NEWMARKET	Bell	Bell Mobility
NEWMARKET	TELUS Store	TELUS
NEWMARKET	Fox Wireless Communications Inc.	TELUS Dealer
NEWMARKET	H.T.S. Communications	TELUS Dealer
NEWMARKET	Rogers Plus	Rogers Wireless
NEWMARKET	Virgin Mobile Store	Virgin Mobile
NIAGARA FALLS	Rogers Wireless	Rogers Wireless
NIAGARA FALLS	Rogers Wireless	Rogers Wireless
NIAGARA FALLS	Bell	Bell Mobility
NIAGARA FALLS	Bell	Bell Mobility
NIAGARA FALLS	TELUS Store	TELUS
NIAGARA FALLS	Performance Wireless	TELUS Dealer

NIAGARA FALLS	Talk Wireless Inc.	TELUS Dealer
NIAGARA FALLS	Rogers Plus	Rogers Wireless
NIAGARA FALLS	Rogers Plus	Rogers Wireless
NORTH BAY	Rogers Wireless	Rogers Wireless
NORTH BAY	Rogers Wireless	Rogers Wireless
NORTH BAY	Rogers Plus	Rogers Wireless
NORTH BAY	Bell	Bell Mobility
NORTH BAY	Bell	Bell Mobility
NORTH BAY	Neil the Computer Store	Bell Mobility
NORTH BAY	TELUS Store	TELUS
NORTH BAY	M. S. Macpherson Leasing Limited	TELUS Dealer
NORTH BAY	Virgin Mobile Store	Virgin Mobile
NORTH YORK	Rogers Wireless	Rogers Wireless
NORTH YORK	Rogers Wireless	Rogers Wireless
NORTH YORK	Rogers Wireless	Rogers Wireless
NORTH YORK	Rogers Wireless	Rogers Wireless
NORTH YORK	Rogers Wireless	Rogers Wireless
NORTH YORK	Rogers Wireless	Rogers Wireless
NORTH YORK	Rogers Wireless	Rogers Wireless
NORTH YORK	Rogers Wireless	Rogers Wireless
NORTH YORK	Rogers Wireless	Rogers Wireless
NORTH YORK	Rogers Wireless	Rogers Wireless
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NORTH YORK	Rogers Wireless	Rogers Wireless
NORTH YORK	Rogers Wireless	Rogers Wireless
NORTH YORK	Rogers Wireless	Rogers Wireless
NORTH YORK	Rogers Wireless	Rogers Wireless
NORTH YORK	Rogers Wireless	Rogers Wireless
NORTH YORK	Rogers Plus	Rogers Wireless
NORTH YORK	Bell	Bell Mobility
NORTH YORK	Bell	Bell Mobility
NORTH YORK	Bell	Bell Mobility
NORTH YORK	Bell	Bell Mobility
NORTH YORK	Bell	Bell Mobility
NORTH YORK	Bell	Bell Mobility
NORTH YORK	Bell	Bell Mobility
NORTH YORK	Bell	Bell Mobility
NORTH YORK	Bell	Bell Mobility
NORTH YORK	Home Electronics & Communications (1998) Ltd.	TELUS Dealer
NORTH YORK	Fox Wireless Communications Inc.	TELUS Dealer
NORTH YORK	One Cell Solutions Inc.	TELUS Dealer
NORTH YORK	Rogers Plus	Rogers Wireless
NORTH YORK	Rogers Plus	Rogers Wireless
NORTH YORK	Fido	Rogers Wireless
OAKVILLE	Rogers Wireless	Rogers Wireless
OAKVILLE	Rogers Wireless	Rogers Wireless
OAKVILLE	Rogers Plus	Rogers Wireless
OAKVILLE	Bell (Kiosk)	Bell Mobility
OAKVILLE	Bell	Bell Mobility
OAKVILLE	Bell	Bell Mobility
OAKVILLE	TELUS Store	TELUS
OAKVILLE	TELUS Store	TELUS
OAKVILLE	TELUS Store	TELUS
OAKVILLE	Maxxim Mobility	TELUS Dealer
OAKVILLE	All Wireless	TELUS Dealer

OAKVILLE	Wireless Wizards Inc.	TELUS Dealer
OAKVILLE	Primeline Connections	TELUS Dealer
OAKVILLE	Rogers Plus	Rogers Wireless
OAKVILLE	Rogers Plus	Rogers Wireless
OAKVILLE	Rogers Plus	Rogers Wireless
OAKVILLE	Rogers Plus	Rogers Wireless
OAKVILLE	Fido	Rogers Wireless
OAKVILLE	Virgin Mobile Store	Virgin Mobile
ORANGEVILLE	Rogers Wireless	Rogers Wireless
ORANGEVILLE	Bell	Bell Mobility
ORANGEVILLE	TELUS Store	TELUS
ORILLIA	Rogers Wireless	Rogers Wireless
ORILLIA	Bell	Bell Mobility
ORILLIA	TELUS Store	TELUS
ORILLIA	Cellro Audio & Communications	TELUS Dealer
ORILLIA	Rogers Plus	Rogers Wireless
ORLEANS	Rogers Wireless	Rogers Wireless
ORLEANS	Bell	Bell Mobility
ORLEANS	TELUS Store	TELUS
ORLEANS	Parlez Wireless Inc.	TELUS Dealer
ORLEANS	Wirelesstore	TELUS Dealer
ORLEANS	Rogers Plus	Rogers Wireless
ORLEANS	Fido	Rogers Wireless
ORLEANS	Rogers Plus	Rogers Wireless
ORLEANS	Rogers Plus	Rogers Wireless
ORLEANS	Virgin Mobile Store	Virgin Mobile
OSHAWA	Rogers Wireless	Rogers Wireless
OSHAWA	Rogers Wireless	Rogers Wireless
OSHAWA	Fido	Rogers Wireless
OSHAWA	Rogers Plus	Rogers Wireless
OSHAWA	Rogers Plus	Rogers Wireless
OSHAWA	Bell	Bell Mobility
OSHAWA	Bell	Bell Mobility
OSHAWA	Bell	Bell Mobility
OSHAWA	TELUS Store	TELUS
OSHAWA	TELUS Store	TELUS
OSHAWA	Williams Communication Services Ltd.	TELUS Dealer
OSHAWA	Virgin Mobile Store	Virgin Mobile
OTTAWA	Rogers Wireless	Rogers Wireless
OTTAWA	Rogers Wireless	Rogers Wireless
OTTAWA	Rogers Wireless	Rogers Wireless
OTTAWA	Rogers Wireless	Rogers Wireless
OTTAWA	Rogers Wireless	Rogers Wireless
OTTAWA	Fido	Rogers Wireless
OTTAWA	Fido	Rogers Wireless
OTTAWA	Rogers Plus	Rogers Wireless
OTTAWA	Rogers Plus	Rogers Wireless
OTTAWA	Rogers Plus	Rogers Wireless
OTTAWA	Rogers Plus	Rogers Wireless
OTTAWA	Rogers Plus	Rogers Wireless
OTTAWA	Rogers Plus	Rogers Wireless

OTTAWA	Rogers Plus	Rogers Wireless
OTTAWA	Rogers Plus	Rogers Wireless
OTTAWA	Rogers Plus	Rogers Wireless
OTTAWA	Rogers Plus	Rogers Wireless
OTTAWA	Bell	Bell Mobility
OTTAWA	Bell	Bell Mobility
OTTAWA	Bell	Bell Mobility
OTTAWA	Bell	Bell Mobility
OTTAWA	Bell	Bell Mobility
OTTAWA	Bell	Bell Mobility
OTTAWA	Bell	Bell Mobility
OTTAWA	Direct Access Communications	Bell Mobility
OTTAWA	TELUS Store	TELUS
OTTAWA	TELUS Store	TELUS
OTTAWA	TELUS Store	TELUS
OTTAWA	TELUS Store	TELUS
OTTAWA	Go Mobile	TELUS Dealer
OTTAWA	Smart-Cell Communications	TELUS Dealer
OTTAWA	Minitel Communications Corporation	TELUS Dealer
OTTAWA	Wirelesstore	TELUS Dealer
OTTAWA	Wirelesstore	TELUS Dealer
OTTAWA	Wirelesstore	TELUS Dealer
OTTAWA	Wirelesstore	TELUS Dealer
OTTAWA	Aztech Communications	TELUS Dealer
OTTAWA	Message Centre Wireless	TELUS Dealer
OTTAWA	SGL Services Comm	TELUS Dealer
OTTAWA	Tyroute Communications Inc.	TELUS Dealer
OTTAWA	CWTA	CWTA
OTTAWA	Rogers Plus	Rogers Wireless
OTTAWA	Rogers Plus	Rogers Wireless
OTTAWA	Rogers Plus	Rogers Wireless
OTTAWA	Rogers Plus	Rogers Wireless
OTTAWA	Rogers Wireless	Rogers Wireless
OTTAWA	Rogers Wireless	Rogers Wireless
OTTAWA	Fido	Rogers Wireless
OTTAWA	Fido	Rogers Wireless
OTTAWA	Virgin Mobile Store	Virgin Mobile
OTTAWA	Virgin Mobile Store	Virgin Mobile
OTTAWA	Virgin Mobile Store	Virgin Mobile
OTTAWA	Virgin Mobile Store	Virgin Mobile
OWEN SOUND	Rogers Wireless	Rogers Wireless
OWEN SOUND	Rogers Wireless	Rogers Wireless
OWEN SOUND	Bell	Bell Mobility
OWEN SOUND	Midwestren Communications	Bell Mobility
OWEN SOUND	TELUS Store	TELUS
OWEN SOUND	Virgin Mobile Store	Virgin Mobile
PARRY SOUND	Bell	Bell Mobility
PARRY SOUND	Ardco Systems Inc.	TELUS Dealer
PEMBROKE	Rogers Wireless	Rogers Wireless

PEMBROKE	Bell	Bell Mobility
PEMBROKE	Wireless Centre	TELUS Dealer
PEMBROKE	Virgin Mobile Store	Virgin Mobile
PERTH	Wireless Centre	TELUS Dealer
PETAWAWA	Total Communications	Bell Mobility
PETERBOROUGH	Rogers Wireless	Rogers Wireless
PETERBOROUGH	Rogers Wireless	Rogers Wireless
PETERBOROUGH	Bell	Bell Mobility
PETERBOROUGH	Excell Communications	Bell Mobility
PETERBOROUGH	Bell	Bell Mobility
PETERBOROUGH	TELUS Store	TELUS
PETERBOROUGH	TELUS Store	TELUS
PETERBOROUGH	Aztech Communications	TELUS Dealer
PETERBOROUGH	Rogers Plus	Rogers Wireless
PETERBOROUGH	Virgin Mobile Store	Virgin Mobile
PICKERING	Rogers Wireless	Rogers Wireless
PICKERING	Rogers Wireless	Rogers Wireless
PICKERING	Rogers Wireless	Rogers Wireless
PICKERING	Bell	Bell Mobility
PICKERING	TELUS Store	TELUS
PICKERING	Fido	Rogers Wireless
PICKERING	Rogers Plus	Rogers Wireless
PICKERING	Virgin Mobile Store	Virgin Mobile
PORT DOVER	David Eaton Computer Services	TELUS Dealer
PORT ELGIN	Rogers Wireless	Rogers Wireless
RENFREW	Priority Business	Bell Mobility
RICHMOND HILL	Rogers Wireless	Rogers Wireless
RICHMOND HILL	Rogers Wireless	Rogers Wireless
RICHMOND HILL	Rogers Wireless	Rogers Wireless
RICHMOND HILL	Uptown Communications (Head Office)	Rogers Wireless
RICHMOND HILL	Rogers Wireless	Rogers Wireless
RICHMOND HILL	Rogers Wireless	Rogers Wireless
RICHMOND HILL	Rogers Wireless	Rogers Wireless
RICHMOND HILL	Rogers Wireless	Rogers Wireless
RICHMOND HILL	Rogers Wireless	Rogers Wireless
RICHMOND HILL	Fido	Rogers Wireless
RICHMOND HILL	Rogers Plus	Rogers Wireless
RICHMOND HILL	Bell	Bell Mobility
RICHMOND HILL	Pacific Link Comm. Inc.	Bell Mobility
RICHMOND HILL	Bell	Bell Mobility
RICHMOND HILL	TELUS Store	TELUS
RICHMOND HILL	Aztech Communications	TELUS Dealer
RICHMOND HILL	Sky Wireless Communications Inc.	TELUS Dealer
RICHMOND HILL	Cellular Battery Corp.	TELUS Dealer
ROCKLAND	Le SuperClub Vidéotron	Vidéotron
SARNIA	Rogers Wireless	Rogers Wireless
SARNIA	Bell	Bell Mobility
SARNIA	Van Communications	Bell Mobility
SARNIA	TELUS Store	TELUS
SARNIA	Empire Wireless Products Inc.	TELUS Dealer
SARNIA	Empire Wireless Products Inc.	TELUS Dealer

SARNIA	Spectrum Wireless Ltd.	TELUS Dealer
SARNIA	Rogers Plus	Rogers Wireless
SARNIA	Rogers Plus	Rogers Wireless
SAULT STE MARIE	Rogers Wireless	Rogers Wireless
SAULT STE MARIE	Rogers Wireless	Rogers Wireless
SAULT STE MARIE	Bell	Bell Mobility
SAULT STE MARIE	Bell	Bell Mobility
SAULT STE MARIE	TELUS Store	TELUS
SAULT STE MARIE	North Shore Alarms & Telecom	TELUS Dealer
SAULT STE MARIE	North Shore Alarms & Telecom	TELUS Dealer
SAULT STE MARIE	Rogers Plus	Rogers Wireless
SAULT STE MARIE	Rogers Plus	Rogers Wireless
SCARBOROUGH	Rogers Wireless	Rogers Wireless
SCARBOROUGH	Rogers Wireless	Rogers Wireless
SCARBOROUGH	Rogers Wireless	Rogers Wireless
SCARBOROUGH	Rogers Wireless	Rogers Wireless
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SCARBOROUGH	Rogers Wireless	Rogers Wireless
SCARBOROUGH	Rogers Wireless	Rogers Wireless
SCARBOROUGH	Rogers Wireless	Rogers Wireless
SCARBOROUGH	Fido	Rogers Wireless
SCARBOROUGH	Rogers Plus	Rogers Wireless
SCARBOROUGH	Rogers Plus	Rogers Wireless
SCARBOROUGH	Rogers Plus	Rogers Wireless
SCARBOROUGH	Rogers Plus	Rogers Wireless
SCARBOROUGH	Bell (Kiosk)	Bell Mobility
SCARBOROUGH	Bell	Bell Mobility
SCARBOROUGH	Bell	Bell Mobility
SCARBOROUGH	Bell	Bell Mobility
SCARBOROUGH	Bell	Bell Mobility
SCARBOROUGH	Bell	Bell Mobility
SCARBOROUGH	Bell	Bell Mobility
SCARBOROUGH	Bell	Bell Mobility
SCARBOROUGH	Bell (Kiosk)	Bell Mobility
SCARBOROUGH	TELUS Store	TELUS
SCARBOROUGH	TELUS Store	TELUS
SCARBOROUGH	TELUS Store	TELUS
SCARBOROUGH	CellCity Communications	TELUS Dealer
SCARBOROUGH	EZ Connect Inc.	TELUS Dealer
SCARBOROUGH	Federal Wireless Communications Inc	TELUS Dealer
SCARBOROUGH	New Page Telecommunication Inc.	TELUS Dealer
SCARBOROUGH	Professional Communications Inc	TELUS Dealer
SCARBOROUGH	Golden Communications Inc.	TELUS Dealer
SCARBOROUGH	West Hill Communications Inc.	TELUS Dealer
SCARBOROUGH	Rogers Plus	Rogers Wireless

SCARBOROUGH	Rogers Wireless	Rogers Wireless
SCARBOROUGH	Fido	Rogers Wireless
SCARBOROUGH	Fido	Rogers Wireless
SCARBOROUGH	Fido	Rogers Wireless
SCARBOROUGH	Fido	Rogers Wireless
SCARBOROUGH	Virgin Mobile Store	Virgin Mobile
SCARBOROUGH	Virgin Mobile Store	Virgin Mobile
SIMCOE	Rogers Wireless	Rogers Wireless
SIMCOE	Bell	Bell Mobility
SIMCOE	KWIC Cellular Inc.	TELUS Dealer
SMITHS FALLS	Bell	Bell Mobility
SMOOTH ROCK FALLS	NTL Mobility Dealer	NTL/Telebec
ST. CATHARINES	Rogers Wireless	Rogers Wireless
ST. CATHARINES	Rogers Plus	Rogers Wireless
ST. CATHARINES	Bell	Bell Mobility
ST. CATHARINES	Bell	Bell Mobility
ST. CATHARINES	TELUS Store	TELUS
ST. CATHARINES	CELLULARWORX	TELUS Dealer
ST. CATHARINES	Performance Wireless	TELUS Dealer
ST. CATHARINES	Talk Wireless Inc.	TELUS Dealer
ST. CATHARINES	Active Wireless Inc.	TELUS Dealer
ST. CATHARINES	Virgin Mobile Store	Virgin Mobile
ST. CATHARINES	Fido	Rogers Wireless
ST. CATHARINES	Bell	Bell Mobility
ST. CATHARINES	Convergent Telecom Inc.	Bell Mobility
ST. CATHARINES	Metrocell Communications	Bell Mobility
ST. THOMAS	Rogers Wireless	Rogers Wireless
ST. THOMAS	Bell	Bell Mobility
ST. THOMAS	Kelcom	TELUS Dealer
ST. THOMAS	Rogers Plus	Rogers Wireless
ST. THOMAS	TELUS Store	TELUS
STITTSVILLE	Bell	Bell Mobility
STITTSVILLE	Freedom Wireless	TELUS Dealer
STITTSVILLE	Rogers Plus	Rogers Wireless
STONEY CREEK	Rogers Wireless	Rogers Wireless
STONEY CREEK	Rogers Plus	Rogers Wireless
STONEY CREEK	TELUS Store	TELUS
STONEY CREEK	Virgin Mobile Store	Virgin Mobile
STRATFORD	Rogers Wireless	Rogers Wireless
STRATFORD	Bell	Bell Mobility
STRATFORD	Perth Communications	Bell Mobility
STRATFORD	TELUS Store	TELUS
STRATFORD	Nexstar Communications	TELUS Dealer
STRATFORD	Rogers Plus	Rogers Wireless
STRATHROY	TELUS Store	TELUS
SUDBURY	TELUS Store	TELUS
SUDBURY	Rogers Wireless	Rogers Wireless
SUDBURY	Rogers Wireless	Rogers Wireless
SUDBURY	Rogers Wireless	Rogers Wireless
SUDBURY	Rogers Plus	Rogers Wireless





TORONTO	Rogers Wireless	Rogers Wireless
TORONTO	Rogers Wireless	Rogers Wireless
TORONTO	Rogers Wireless	Rogers Wireless
TORONTO	Rogers Wireless	Rogers Wireless
TORONTO	Fido	Rogers Wireless
TORONTO	Fido	Rogers Wireless
TORONTO	Fido	Rogers Wireless
TORONTO	Rogers Plus	Rogers Wireless
TORONTO	Rogers Plus	Rogers Wireless
TORONTO	Rogers Plus	Rogers Wireless
TORONTO	Rogers Plus	Rogers Wireless
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TORONTO	Rogers Plus	Rogers Wireless
TORONTO	Rogers Plus	Rogers Wireless
TORONTO	WWF-Canada	Bell Mobility
TORONTO	Bell	Bell Mobility
TORONTO	Bell	Bell Mobility
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TORONTO	BAKA Communications	Bell Mobility
TORONTO	Bell	Bell Mobility
TORONTO	BAKA Communications	Bell Mobility
TORONTO	BBI Telecommunications	Bell Mobility
TORONTO	TELUS Store	TELUS
TORONTO	TELUS Store	TELUS
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TORONTO	TELUS Store	TELUS
TORONTO	TELUS Store	TELUS
TORONTO	Connect-Us Inc.	TELUS Dealer
TORONTO	NEXGEN Wireless Corp	TELUS Dealer
TORONTO	Bcellular Communications Inc.	TELUS Dealer
TORONTO	MobileAXS Inc.	TELUS Dealer
TORONTO	MobileAXS Inc.	TELUS Dealer
TORONTO	Hotwire Communications	TELUS Dealer
TORONTO	Bungee Wireless	TELUS Dealer
TORONTO	Bungee Wireless	TELUS Dealer
TORONTO	Cellular Max Communications Inc.	TELUS Dealer
TORONTO	New Page Telecommunication Inc.	TELUS Dealer
TORONTO	New Page Telecommunication Inc.	TELUS Dealer
TORONTO	New Page Telecommunication Inc.	TELUS Dealer
TORONTO	Aztech Communications	TELUS Dealer
TORONTO	Golden Communications Inc.	TELUS Dealer
TORONTO	Speed Dial Communications Inc.	TELUS Dealer
TORONTO	Cellular Systems	TELUS Dealer
TORONTO	Rogers Plus	Rogers Wireless
TORONTO	Rogers Plus	Rogers Wireless
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TORONTO	Fido	Rogers Wireless
TORONTO	Fido	Rogers Wireless
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TORONTO	Fido	Rogers Wireless
TORONTO	Fido	Rogers Wireless
TORONTO	Virgin Mobile Store	Virgin Mobile
TORONTO	Virgin Mobile Store	Virgin Mobile
TORONTO	Virgin Mobile Store	Virgin Mobile
TORONTO	Virgin Mobile Store	Virgin Mobile
TRENTON	Bell World	Bell Mobility
TRENTON	Rogers Plus	Rogers Wireless
UXBRIDGE	Rogers Wireless	Rogers Wireless
UXBRIDGE	Bell	Bell Mobility
VAUGHAN	Rogers Wireless	Rogers Wireless
VAUGHAN	Fido	Rogers Wireless
VAUGHAN	Bell	Bell Mobility
VAUGHAN	TELUS Store	TELUS
VAUGHAN	In Touch Mobility Ltd.	TELUS Dealer
WALKERTON	Rogers Wireless	Rogers Wireless
WALLACEBURG	Internet Kent Inc.	TELUS Dealer
WATERDOWN	Communications Plus	TELUS Dealer
WATERDOWN	Rogers Plus	Rogers Wireless
WATERLOO	Rogers Wireless	Rogers Wireless
WATERLOO	Fido	Rogers Wireless
WATERLOO	Rogers Plus	Rogers Wireless
WATERLOO	Bell	Bell Mobility
WATERLOO	BAKA Communications	Bell Mobility
WATERLOO	TELUS Store	TELUS
WATERLOO	GT Wireless	TELUS Dealer
WATERLOO	Rogers Plus	Rogers Wireless
WATERLOO	Rogers Plus	Rogers Wireless
WATERLOO	Rogers Wireless	Rogers Wireless
WATERLOO	Virgin Mobile Store	Virgin Mobile
WELLAND	Rogers Wireless	Rogers Wireless
WELLAND	Bell	Bell Mobility
WELLAND	In Touch Communications	Bell Mobility
WELLAND	Performance Wireless	TELUS Dealer
WELLAND	Fido	Rogers Wireless
WESTON	Wireless Personal Communications	Bell Mobility
WHITBY	Rogers Wireless	Rogers Wireless
WHITBY	Rogers Plus	Rogers Wireless
WHITBY	Rogers Plus	Rogers Wireless
WHITBY	Bell	Bell Mobility
WHITBY	Excell Communications	Bell Mobility
WHITBY	Bell	Bell Mobility
WHITBY	TELUS Store	TELUS
WHITBY	Rogers Plus	Rogers Wireless
WILLOWDALE	Rogers Wireless	Rogers Wireless

WILLOWDALE	Bell (Kiosk)	Bell Mobility
WILLOWDALE	Virgin Mobile Store	Virgin Mobile
WINDSOR	Rogers Wireless	Rogers Wireless
WINDSOR	Fido	Rogers Wireless
WINDSOR	Rogers Plus	Rogers Wireless
WINDSOR	Rogers Plus	Rogers Wireless
WINDSOR	Bell	Bell Mobility
WINDSOR	Bell	Bell Mobility
WINDSOR	Bell	Bell Mobility
WINDSOR	Bell	Bell Mobility
WINDSOR	TELUS Store	TELUS
WINDSOR	TELUS Store	TELUS
WINDSOR	Comstar Mobility	TELUS Dealer
WINDSOR	Kelcom	TELUS Dealer
WINDSOR	Kelcom	TELUS Dealer
WINDSOR	F.M.Communications	TELUS Dealer
WINDSOR	Rogers Plus	Rogers Wireless
WINDSOR	Rogers Plus	Rogers Wireless
WINDSOR	Fido	Rogers Wireless
WINDSOR	Virgin Mobile Store	Virgin Mobile
WINDSOR	Virgin Mobile Store	Virgin Mobile
WOODBIDGE	Rogers Wireless	Rogers Wireless
WOODBIDGE	Rogers Wireless	Rogers Wireless
WOODBIDGE	Bell	Bell Mobility
WOODBIDGE	Fox Wireless Communications Inc.	TELUS Dealer
WOODSTOCK	Rogers Wireless	Rogers Wireless
WOODSTOCK	Bell	Bell Mobility
WOODSTOCK	TELUS Store	TELUS
WOODSTOCK	Nexstar Communications	TELUS Dealer
WOODSTOCK	Rogers Plus	Rogers Wireless
WOODSTOCK	Rogers Plus	Rogers Wireless

## **Appendix D, ISO Certification Descriptions**

### ***D.1 ISO 9001***

#### **Abstract<sup>8</sup>**

ISO 9001:2000 specifies requirements for a quality management system where an organization

1. needs to demonstrate its ability to consistently provide product that meets customer and applicable regulatory requirements, and
2. aims to enhance customer satisfaction through the effective application of the system, including processes for continual improvement of the system and the assurance of conformity to customer and applicable regulatory requirements.

All requirements of this International Standard are generic and are intended to be applicable to all organizations, regardless of type, size and product provided.

Where any requirement(s) of this International Standard cannot be applied due to the nature of an organization and its product, this can be considered for exclusion.

Where exclusions are made, claims of conformity to this International Standard are not acceptable unless these exclusions are limited to requirements within clause 7, and such exclusions do not affect the organization's ability, or responsibility, to provide product that meets customer and applicable regulatory requirements.

### ***D.2 ISO 14001***

#### **Abstract<sup>9</sup>**

ISO 14001:2004 specifies requirements for an environmental management system to enable an organization to develop and implement a policy and objectives which take into account legal requirements and other requirements to which the organization subscribes, and information about significant environmental aspects. It applies to those environmental aspects that the organization identifies as those which it can control and those which it can influence. It does not itself state specific environmental performance criteria.

ISO 14001:2004 is applicable to any organization that wishes to establish, implement, maintain and improve an environmental management system, to

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<sup>8</sup> As stated on the iso.org website

<sup>9</sup> As stated on the iso.org website

assure itself of conformity with its stated environmental policy, and to demonstrate conformity with ISO 14001:2004 by

- a) making a self-determination and self-declaration, or
- b) seeking confirmation of its conformance by parties having an interest in the organization, such as customers, or
- c) seeking confirmation of its self-declaration by a party external to the organization, or
- d) seeking certification/registration of its environmental management system by an external organization.

All the requirements in ISO 14001:2004 are intended to be incorporated into any environmental management system. The extent of the application will depend on factors such as the environmental policy of the organization, the nature of its activities, products and services and the location where and the conditions in which it functions.

## Appendix E, Example Promotional Materials

### E.1 Media Coverage

#### Winners Phones-for-Food challenge



Michael Boudreau, back left, Rogers vice-president for Atlantic Canada, Dianne Swinemar, back right, executive director of Feed Nova Scotia, and Sackville High students (left to right) Katelynn Savage, Katie Whiteway, Kaitlyn MacDonald and Alyssa Brooks show off a cart of used cellphones yesterday that metro high school students collected for the Rogers Phones-for-Food High School Challenge. Sackville High won the challenge, which raises money for Feed Nova Scotia.

# Students exchange phones for food

## Campaign to benefit graduating students and Feed Nova Scotia

As part of an effort to engage high schools across Halifax Regional Municipality to help reduce e-waste and support local food banks, Grade 12 students from Sackville High School, Prince Andrew High School and Cole Harbour District High School entered the race to collect as many used wireless devices as possible over the next month.

In a joint campaign with

Rogers Communications Inc. and Feed Nova Scotia, the school that gathers the most cellphones per graduating student by March 25 will win \$3,000 towards the graduating class's commencement ceremonies. Second and third place schools will be awarded \$1,250 and \$750, respectively.

"Today's youth are more conscious than ever about the environment and about the needs of their community," said Michael Roudreau, Atlantic Canada vice president, for Rogers Communications Inc. "The Rogers Phones-for-Food High School Challenge is designed to help high-school students discover that, individually

and collectively, they can make a difference."

The award-winning Phones-for-Food program began in 2003 as an initiative by the Canadian Association of Food Banks (CAFB) in order to alleviate hunger and divert waste from landfill sites. In addition to money raised through the CAFB's Think Food program, almost \$500,000 has been generated for food banks across the country to date. One wireless device, depending on its age and condition, can be worth up to \$5 when donated, which is the equivalent to a jar of peanut butter, one carton of milk or even an entire meal.

"Last year, on average, 40,000 people in Nova Scotia accessed our member agencies every month," said Dianne Swinemar, executive director of Feed Nova Scotia. "People of all ages rely heavily on our province-wide food distribution and it's great to see high schools on board and helping out. And, Rogers has truly been a leader in finding an easy and convenient way for its customers to donate their used wireless devices and help a noble cause."

For information on how to donate to Phones-for-Food visit [www.phonesforfood.com](http://www.phonesforfood.com) and download a postage-paid mailing label.

Figure 6 Media coverage for Rogers' Phones for Food challenge

## Province rings up a recycling first

Drop-off spots created for wireless devices

By BRUCE ERSKINE Business Reporter

Nova Scotia is the first province in the country to adopt Recycle My Cell, a new program that makes it easier to recycle cellphones and other wireless devices.

"On Feb. 1, at more than 250 locations throughout the province, Nova Scotians will be able to drop off their cellphones, pagers, Smart Phones, BlackBerrys and Air Cards to be reused and recycled," Environment Minister David Morse said at a news conference in Halifax on Tuesday announcing the launch of the project of the Canadian Wireless Telecommunications Association.

"In addition, headsets, cellphone batteries and chargers will also be included in the program," he said.

The recycling program will help the province reach its solid waste management goals, Mr. Morse said; these include reducing its solid waste disposal rate by 38 per cent from 2006 levels, by 2015.

"The disposal rate per person, per year, in Nova Scotia will be no more than 300 kilograms," he said, adding that the province's current solid waste disposal rate is 50 per cent lower than the national average. "This program will help us to continue to be leaders in this area."

Anyone who wants to recycle a wireless device, regardless of carrier, brand or condition, can find the nearest drop-off locations among more than 3,500 sites nationwide by entering their postal codes at [www.RecycleMyCell.ca](http://www.RecycleMyCell.ca) or by calling 1-888-797-1740. The website also includes information on how to send recyclables to drop-off locations by mail, postage paid.

Recycled devices are refurbished or taken apart for scrap and then sold, with the proceeds donated to national and local charities.

Dianne Swinemar, executive director of Feed Nova Scotia, called the recycling program a "winning combination" of environmental protection and support for important charitable organizations. She estimated that the program could provide the food bank with \$10,000 in additional funds annually.

Telecommunications Association president and CEO Bernard Lord, the former premier of New Brunswick, said the recycling program demonstrates that thinking green doesn't need to be complicated to have a major impact.

"Last year, wireless companies collected more than 300,000 wireless devices through various recycling initiatives," he said, adding that there are no fees associated with the new program, whose costs are being



borne by association members, including Bell, Greentec, Kyocera, Motorola, MTS, Nokia, ReCellular Inc., Research in Motion, Rogers Communications Inc., Samsung, SaskTel, TbayTel, TELUS and Virgin Mobile Canada.

"We hope to increase that number to 500,000 per year," said Mr. Lord, who noted that there are more than 22 million mobile telecommunication devices in use in Canada.

"This is a growing industry that is transforming our lives and helping us in so many ways. We want to make sure that as we improve the lives of Canadians with more wireless devices, that we also protect the environment at the same time."

( [berskine@herald.ca](mailto:berskine@herald.ca) )

**Figure 7** Media Coverage for Recycle My Cell launch in Nova Scotia.

**E.2 Advertising Material**



**Figure 8** Advertisement for *Recycle My Cell* program



**Figure 9** In-store display of TELUS' *Return and Recycle* program



# A good call for our planet.

Put your used mobile phones and accessories in the Bell Blue Box and help our environment in 2 ways:

- Phones will be recycled to keep the materials out of a landfill - or even refurbished to give them a new life.
- Bell will donate the net proceeds from refurbished and recycled phones to support WWF-Canada's environmental conservation work.

**Bell** blue box



Images: © 2010 Fonds symbol WWF-World Wide Fund for Nature (also known as World Wildlife Fund) "WWF" is a WWF Registered Trademark.  
BMOB\_0511\_M1\_E

**Figure 10** In-store poster for Bell's *Mobile Take-Back* program



# HELP FEED SOMEONE IN NEED

Recycle your used wireless phone

## DONATE HERE

Phones collected will be recycled to benefit the Phones-for-Food program administered by Food Banks Canada and sponsored by Rogers Wireless. Plus, you're helping to maintain a safe and healthy environment.




For more information about  
Phones-for-Food, visit  
[phonesforfood.com](http://phonesforfood.com)



For more information about  
wireless recycling, visit  
[recyclemycell.ca](http://recyclemycell.ca)



\*Rogers & Mobile Design are trademarks of Rogers Communications Inc. used under license. All other brand names & logos are trademarks of their respective owners. © 2009 Rogers Wireless

200903-00 12/08

Figure 11 In-store poster of Rogers' Phones for Food program



# RECYCLE YOUR PHONE

## Reduce hunger

Drop off your used phone here.  
You'll help the Phones-for-Food program,  
an initiative of Food Banks Canada.  
And you'll be helping the environment too.



[www.phonesforfood.com](http://www.phonesforfood.com)



[www.ca1b-acba.ca](http://www.ca1b-acba.ca)



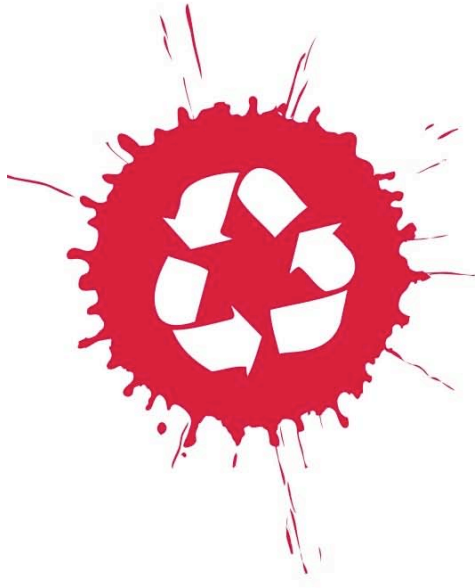
[www.recyclemycell.ca](http://www.recyclemycell.ca)



[www.purotator.com](http://www.purotator.com)



Figure 12 In-store poster of Fido's *Phones for Food* program



# **RED IS THE NEW GREEN.**

**DO SOMETHING GOOD  
FOR THE PLANET AND  
RECYCLE YOUR OLD  
MOBILE PHONE.  
HERE'S HOW:**

- 1** Hand any brand's old mobile phone to a Virgin Mobile Sales Associate.
- 2** Let us take care of the rest and feel good!

**[virginmobile.ca/recycle](http://virginmobile.ca/recycle)**



**Figure 13** In-store poster of Virgin Mobile Canada's *Red is the New Green* program

# Cell Phone Recycling

Please, don't forget to erase personal information like contact names and phone numbers from your old cell phone.



**Do you have an old cell phone?**



Recycle it here, and all proceeds collected will go to Canadian environmental organizations. It's good for our planet.

mts.ca

**MTS**

Figure 14 In-store poster for MTS' Cell Phone Recycling program



## E.3 Mail-back Labels

**Food Banks Canada**  
Formerly Canadian Association of Food Banks

Donate | Contact Us | Français  
Sign Up For Our Newsletter  
Member Login

About Us | About Our Members | About Our Partners | About Hunger in Canada | Get Involved | Media

### phones for food

Recycle your cell phone for your local food bank

#### About Phones for Food

Phones for Food was the first national wireless device recycling program of its kind in Canada. Since its launch in 2003, the program has diverted more than 400,000 cell phones from landfills while distributing more than \$600,000 to food banks. The Phones for Food program is administered by Food Banks Canada with support from Rogers Communications Inc. and Purolator and recycling provided by ReoCellular, Inc.

#### E-waste in Canada

More than 140,000 tons of computer equipment, phones, televisions, stereos and small home appliances accumulate in Canadian landfills each year. Worldwide, 20 to 50 million metric tons of e-waste are disposed of annually. 95% of the materials in an average mobile device are recyclable and many phones that end up in landfills are useable if refurbished.

#### Recycle My Cell

Recycle My Cell is a national industry initiative led by the Canadian Wireless Telecommunications Association (CWTA) along with its members (wireless manufacturers and service providers) to raise awareness about mobile device recycling. Phones for Food, through its partnership with Rogers Communications Inc., is a participating program of Recycle My Cell.

#### How Phone Recycling Works

Once received at the Phones for Food collection depot, phones are tracked and delivered to ReoCellular, the foremost wireless device remanufacturing company in North America, with exceptional environmental standards and practices.

Phones are refurbished and resold. Any phone that cannot be refurbished is recycled according to the highest environmental standards. ReoCellular's environmental statement is available at [reoCellular.com/environment](http://reoCellular.com/environment).

#### Who Does the Program Help?

Food Banks Canada is the national organization representing a network of over 450 regional and community food banks across Canada. Funds generated through the resale of refurbished phones are directed back to the food bank community to assist the more than 720,000 individuals who access food banks each month. One wireless device, depending on its age and condition, can generate an average of \$2-\$5 for a local food bank.

#### How You Can Participate

Donations of phones can be made at all Rogers Plus, Fido and Rogers Wireless Authorized Dealers in Canada or sent by Canada Post to the Phones for Food collection depot using the [prepaid mailing label](#). Not only will your donation help the effort to divert electronic waste from landfills, you can make a personal contribution toward reducing hunger in Canada.

<b>From/Exp. :</b>		
Name/Nom :		
Company/Compagnie :		
Street/Rue :		
City/Ville :		
Postal Code/Code postal :		<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p><b>Regular Parcel</b></p> <p>Return Service</p> </div> <div style="text-align: center;"> <p><b>Colis standard</b></p> <p>Service de retour</p> </div> </div>
<b>To/Dest. :</b>		
Sims Recycling Solutions Canada		
275 STEELWELL ROAD		
BRAMPTON ON L6T 0C8		<b>L6T</b>
L6T0C8+D		
<small>Sender warrants that this item does not contain dangerous goods. L'expéditeur garantit que cet envoi ne contient pas de matières dangereuses.</small>		
<small>33-086-632 (03-10)</small>		

**Figure 15** Example of instructions and mail-back label for Rogers' *Phones for Food* program

## E.4 Corporate Recycling Webpages

telusmobility.com | mytelusmobility.com [search](#)

[Home](#) [Products & Services](#) [Web Store](#) [Client Care](#) [Cool Stuff](#) [About Us](#) [Send a Message](#)

you are here > [about us](#) / [public\\_affairs](#) / [recycling](#)

**TELUS**  
the future is friendly™

### public affairs

| [add the code](#) | [community investment](#) | [e911](#) | [friendly phone tips](#) | [recycling](#) | [safe driving](#) |  
| [unsolicited phone calls/telemarketing fraud](#) | [wireless phones and your health](#) |

### recycling

#### Got an old phone? Recycle it. TELUS' Return & Recycle Program



TELUS' Return & Recycle Program is a national environmental initiative to help divert hazardous materials (such as batteries) from landfills. It is a free program for the general public to return their unwanted handsets and/or accessories, irrespective of the carrier. In an effort to increase TELUS' commitment in environmental stewardship, TELUS has partnered with Tree Canada. Through Tree Canada, TELUS will plant a tree for each handset collected through the Return & Recycle Program. Last year, our program collected over 40,000 phones, click [here](#) to see where we are planting the trees.

Anyone can drop off old phones and accessories at TELUS stores and dealers across Canada. Old phones received will be broken down into its various components and recycled in a responsible manner.

**Note:** Phones **must** be **deactivated** and **personal content** (such as contacts, SIM cards & pictures) **must be removed** prior to drop-off. Phones cannot be reclaimed at a later date.

To read about our other environmental initiatives, please visit [telus.com/environment](http://telus.com/environment).

Click here for the [FAQs](#).



Phat phones.  
Slim prices.



Get smart.



MOTO  
Q™ 9c

LG Dare™  
only \$49.99\*



HTC Touch Dual™  
smartphone



Figure 16 Snapshot of telusmobility.com's recycling page



Shop

Support



Mobile



Internet



TV



Home phone



Billing



FAQ

Mobile

Getting started

Account management

Billing

Coverage & travel

Smartphones & phones

Features

Troubleshooting

Home Support Mobile

## Bell Blue Box program

The Bell Blue Box program (formerly known as the Mobile Take-Back program) is simple. Return your used mobile phones and in turn Bell will donate \$1 to WWF-Canada for each unit collected.

You can return used mobile phones from all manufacturers to any of our **authorized retailers**. You can also ship your phone by **Canada Post**, free of charge. You can also bring the devices to a participating **Caisse Desjardins**.

Recovered phones will be **reused or recycled**.

The program also recycles all mobile phone accessories, batteries, and even smartphones. All data on the returned devices will be deleted.

This simple action goes a long way to help protect the environment. It prevents electronic waste, the fastest-growing form of waste in the country, from ending up in landfill sites. Your donation will also be helping WWF-Canada, the global conservation organization to fight climate change.

The Bell Blue Box program was initially launched in 2003 and since then, more than 494,000 mobile phones and 80 metric tons of batteries and accessories have been diverted from landfill. For more information about this program, see the **FAQ**.

The Bell Blue Box program was awarded the prestigious "Retail Corporate Social Responsibility Initiative Award" by the Retail Council of Canada in 2006 and was recently awarded the 2006 Phénix environmental award, in the category of Réalisation-Entreprise [Achievement - Corporation].



WWF-Canada works to stop the degradation of the planet's natural environment by conserving the world's biological diversity, ensuring that the use of renewable natural resources is sustainable and promoting the reduction of pollution and wasteful consumption. WWF-Canada is working with government, corporations and individuals to reduce greenhouse gas emissions that cause climate change. For more information, consult **WWF-Canada**.

© 1986 Panda symbol WWF-World Wide Fund For Nature (also known as World Wildlife Fund)  
© "WWF" is a WWF registered trade-mark

### Account management

- Understanding your bill
- Reset your voicemail password
- Change your services
- Change your phone number

### Features & services

- Call Forwarding
- Call Waiting
- Conference Calling
- Roadside Assistance
- User guides

### Coverage & travelling

- Travel
- Network troubleshooting
- Wireless road safety
- E 9-1-1

### Shop

- Smartphones & phones
- Rate plans
- Mobile entertainment
- Accessories
- Features & add-ons
- Upgrade your phone & more
- Promotions


Figure 17 Snapshot of Bell.ca's recycling webpage

FRANÇAIS TOP UP YOUR PREPAID ACTIVATE YOUR PREPAID PHONE MY ACCOUNT

Virgin mobile PHONES PLANS HOT OFFERS STAY CONNECTED VIRGIN MOBILE LIVE™ HOW DO IT? WHY CHOOSE US?

# recycling IS GOOD.


## RECYCLE YOUR OLD MOBILE PHONE AND HELP MAKE THE WORLD MORE GREEN.



WHEN IT COMES TO PROTECTING THE PLANET, VIRGIN MOBILE IS PASSIONATE ABOUT MAKING SURE WE CAN GIVE MOTHER EARTH A HAND EVERY CHANCE WE GET.

The little things add up. If everyone recycled their old mobile phones, just imagine how much landfill waste we'd reduce.

Head to any Virgin Mobile Store and put your old phone (any brand from any company) into one of our drop boxes. Phones will be recycled in an environmentally safe way and we'll be one step closer to a cleaner world.



### HERE'S WHAT TO DO:

- 1 GO TO A VIRGIN MOBILE STORE
- 2 HAND ANY BRAND'S OLD MOBILE PHONE TO A VIRGIN MOBILE SALES ASSOCIATE
- 3 FEEL GOOD

Pretty easy, if we do say so ourselves.

To find out more about the CWTA (that's Canadian Wireless Telecom Association) Recycle My Cell program click below.

[LEARN MORE](#)

Phones Preloved Accessories	Plans myPlan™ BlackBerry® Prepaid	Hot Offers Promotions Contests Klubbaks myVIP Rewards™	Stay Connected Text messaging Text add-ons Instant messaging	Virgin Mobile Live™ Download store 1st Dibs™ Pic and Vid Sharing	How Do I? FAQs Where to buy User guides Customer updates	Why Choose Us? Your choice You Can Switch News and media Be A Do Gooder Jobs	My Account Log In
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Contact Us Store Locator Coverage Maps Sitemap Legal Français Virgin.com Copyright Virgin Mobile Canada. All rights reserved.

Figure 18 Snapshot of VirginMobile.ca's recycling webpage


**MTS** Home | About MTS Allstream | My Account | Support | Store Locator | Search mts.ca

→ **MTS Personal** Bundles | Wireless | Internet | TV | Phone Services | Security & Alarms

→ MTS, The Environment & You

Online Bill

Recycle Your Phone




### MTS, The Environment & You

Long considered an environmental leader in the Canadian telecommunications industry, MTS further strengthened its focus on the environment in 2007.

The company's renewed corporate environmental strategy (the MTS Allstream 'Green Plan') includes initiatives which further reduce our environmental footprint and, most importantly, help our Canadian customers - corporate and consumer - reduce their own environmental footprints.


**MTS Online Bill**



"Green", Simple, and Fast! MTS Online Bill saves time and makes your billing process completely paperless!

→ [Learn More](#)

**MTS Cell Phone Recycling**




Drop off your old cell phones at any MTS Connect Store, or MTS building with all proceeds going directly to a Canadian environmental organization.

→ [Learn More](#)

Figure 19 Snapshot of MTS.ca's recycling webpage

You are here - Nokia Canada » About Nokia » Environment » we:recycle

**NOKIA**  
Connecting People

English | Français  View cart

Site search

Home Find products Get support and software Explore services Find a store About Nokia Music

Media centre Community involvement Environment Nokia in Canada

we:recycle

- Why recycle?
- Where and how to recycle
- Recycling through life cycle
- 3 Steps
- Recycle

we:create


we:energise

we:support


we:evolve

Our responsibility

**we:recycle**




**Why recycle?**



Find out how, by recycling together we could save nearly 80,000 tonnes of raw materials.

[Read more](#)

**Where and how to recycle**



Learn how easy it is to recycle.

[www.recyclemycell.ca](http://www.recyclemycell.ca)

[Nokia for Business](#) [Operators](#) [Investors](#) [Developers](#) [Press](#) [About Nokia](#) [Careers](#)

[Nokia Worldwide](#) [Locations](#) [Site index](#) [Site terms](#) [Privacy policy](#) [Nokia Accessibility](#)

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**Figure 20** Snapshot of Nokia.ca's recycling webpage

## Appendix F, Life Cycle Model

The Life Cycle Model (LCM) was developed in order to obtain *available for collection* data (data on the number of cell phones that are available to be collected each year), and also to derive *collection target* data (a good estimate of the number of cell phones that can be collected out of the amount available).

In November 2009 CWTA commissioned a *Harris/Decima* study on cellular phone recycling in Canada. With this new data, along with data from the same study that was commissioned in 2008, CWTA has updated the Life Cycle Model in order to give a more accurate representation of consumer habits and the life cycle of an average cell phone.<sup>10</sup>

Most phones are assumed to have a lifespan of either three, four or five years which can further be broken down into a *first life* and *second life*. The *first life* starts at the point of sale when the phone is originally purchased. The *second life* usually begins years later when the user must decide whether to replace their phone with a new one; the old phone may be reused (by the user themselves), sold, stored away, given away to family or friends, donated to charity, etc.

Through the surveys it was found that about 27.5% of phones become available for collection at the end of their *first life* (three years after entering the market). In addition, the surveys indicate that 72.5% of phones do have a *second life* and are reused in some way when their *first life* is over. This *second life* lasts an extra 15 months on average, at which point the phone becomes available for collection. The calendar year in which a phone, at the end of its *second life*, becomes available for collection is dependent on the month it starts its *second life*. Since the average *second life* is 15 months, a phone that starts its *second life* in January of 2006 will become available for collection in May **2007**, while a phone that begins its *second life* in October 2006 will become available for collection in January **2008**. The Life Cycle Model takes into account the fact that 75% of phones in any given calendar year, going through a *second life*, will be available for collection the very next year, whereas the other 25% will not be available for collection until the year after. The total lifespan of a phone that goes through both a *first* and *second life* is 4.25 or 5 years depending on what month it began its *second life*. This is represented in the following diagram.

---

<sup>10</sup> The five main differences between the new and old life cycle are as follows: there are almost 10% less phones being stored; cell phone recycling has doubled; returns to a retailer has doubled; roughly 10% more phones are being discarded after their *first life* and therefore don't go on to have a *second life*; and the *second life* of a phone is now being estimated at 15 months instead of 24 months.





Table 4 shows how the Life Cycle Model identifies the number of phones that are available for collection given the assumptions of the new Life Cycle Model. To determine the number of phones available in any year it is necessary to consider three separate years worth of data, which make up the *first* and *second lives* of the phones.

Of the phones released into the market in 2003 27.5% of them will be available for collection in 2006 at the end of their *first life* (three years after entering the market). The remaining 72.5% will continue into a *second life* that will last an additional 15 months. These phones will become available for collection in either 2007 or 2008 depending on which month in the calendar year they were initially purchased.

The CWTA has been tracking cell phone collections for many years on a national basis and has data as far back as 2005. Along with this data and the numbers obtained through the Life Cycle Model we have calculated a set of *available for collection* and *collection target* data.

## Appendix G, Non-Affiliated Third-Party Programs

Examples of third-party collection programs, sites and events:

- **Best Buy and Future Shop** stores in Canada offer boxes for customers to recycle cellular phones at no charge.  
<http://www.bestbuy.ca/marketing/recycling/EN/default.asp?logon=&langid=EN>  
<http://www.futureshop.ca/marketing/recycle/default.asp?langid=EN&logon=&langid=EN>
- **Charitable Recycling Program:** “For every used cell phone we receive - we will make a donation to a charity.”  
<http://www.charitablerecycling.com/CR/home.asp>
- **PITCH-IN CANADA** runs its National Cell Phone Collection Program in partnership with local community groups, schools and other civic-minded organizations. The program includes nearly 800 listed collection points.  
<http://www.pitch-in.ca/Pitch-In.php>
- **Project Redial**-(Canadian Diabetes Association): “Project Redial offers Canadians the opportunity to conveniently donate their unwanted cell phone(s).”  
[http://www.diabetes.ca/section\\_services/redialindex.asp](http://www.diabetes.ca/section_services/redialindex.asp)
- **The Rechargeable Battery Recycling Corporation** runs a nationwide Call 2 Recycle program and has 200 drop-off spots for cell phones and batteries including sites at: Batteries Expert, Battery Plus, Black & Decker, The Home Depot, Home Hardware, London Drugs, OfficeMax, Personal Edge/Centre du Rasoir, Revy, Sears, The Source by Circuit City, Staples, Zellers.  
<http://www.rbrbc.org/call2recycle>
- There are also many U.S.-based cell phone collectors that accept products by mail.

## **Appendix H, Summary of Public Consultations**

### **Will there be a role for OES/Steward Edge in the ongoing collection of material, particularly from communities that are not listed on the RMC Web site?**

CWTA would be pleased to include OES/Steward Edge depots as collection sites for the Recycle My Cell program in communities that are serviced by OES/Stewards Edge and not directly by Recycle My Cell.

### **Do collectors receive any compensation or incentives for phone collection?**

No compensation or incentives are provided for phone collection.

### **What happens to the 4% of material that is not recyclable?**

The 4% of the product that is not recyclable is mainly made up of plastics that are found in most cell phones; this material is recovered as fuel/energy in the precious metal refining process.

### **What is the difference between “regulatory approval” and “formal recognition” for RMC in various provinces? What agreements have you entered into with the groups responsible in each province for recycling (i.e. SWEEP)?**

Regulatory approval has been provided in those provinces that have included cell phones in their formal e-waste regulations. In provinces where cell phones are not yet included in formal regulations, and where no framework exists, formal regulatory approval cannot be provided. In those provinces Recycle My Cell has been publicly recognized as an industry-wide initiative to recover and recycle cell phones through a formal press conference. CWTA and the government of each province issued joint press statements formally recognizing the program, and CWTA committed to providing annual reports to the respective ministries.

If an organization, such as SWEEP, finds that it is collecting wireless devices as incidental waste through its channels CWTA will arrange for a collection box to be provided. To-date, CWTA has not been advised that wireless devices as incidental waste is an issue.

### **Will CWTA canvass specific municipalities to identify those that might like to add a local library or school to our collection network?**

We encourage businesses and municipalities to be listed as drop-off locations. The goal of Recycle My Cell is to make recycling as easy as possible for consumers. The CWTA intends to work through municipal associations, as it has in other provinces, to identify any municipal locations that would like to be included.

### **What is included in ‘churn’ figures?**

*Churn* is defined as the number or proportion of subscribers who leave their carrier over a period of time; these customers are either becoming new subscribers at another carrier or not getting a new account.

**Is there a materials tracking system in place?**

Each processor involved in the program tracks the materials in their network; this information is made available to the carriers that they service.

**What is the monetary return on each cell phone?**

The value of each phone is dependent on several factors including its make, model and condition, as well as whether it can be refurbished for resale (as opposed to recycled). A donation to participating charities is made for each device returned through the various carrier recycling programs.

**Are you working toward a situation where if a store sells cell phones they will take them back?**

CWTA and its members believe that a return-to-retail model is the most appropriate and effective method available for wireless device collection, and reflects the principle of extended producer responsibility. Having dealerships act as collection sites provides a convenient method of device return as consumers can leave their old phones for recycling at the same location and time a new phone is purchased.

**Will the CWTA program meet the same standards as that of other programs in the province?**

CWTA must show that the ISP they are proposing is as good as, if not better than, that of OES.

## **Appendix I, Summary of Consultation with WDO PAC**

**You note that the programs under Recycle My Cell have met with ‘great success’. What does this mean?**

Nationally last year the programs under Recycle My Cell collected 350,167 devices. In Ontario specifically this translates into 139,853 devices diverted from landfill.

**Is the Wireless Alliance part of your program? They have approached the Toronto School board to participate in a recycling program. Is this something that can happen through your program?**

The Wireless Alliance is not affiliated with Recycle My Cell. We do accommodate groups wanting to become involved in our program and have included several municipal locations as drop-off sites. There are mechanisms in place to facilitate collection drop box delivery/pick-up, and to provide promotional materials as requested.

**Are you associated with recyclemycell.com? When searching on-line for your site I automatically defer to .com and not .ca.**

We are not associated with recyclemycell.com.

**Do consumers get information at the point of sale?**

The information a consumer receives about recycling at the point of sale is dependent on the brand owner. Often the box that contains the new phone will also include a pre-paid mail-back envelope to allow for easy recycling of their old device. Other brand owners provide verbal information about their recycling program at the time of sale.

**Is the mail-back envelope branded with Recycle My Cell? Does it get returned to you?**

The envelope is branded with the carrier’s information. The device is returned to the processor that is affiliated with the carrier’s program.

**You mention that banner ads are available. Do carriers and manufacturers use those?**

Yes, we make them available for their use.

**In terms of promotion in Ontario, what have you done so far?**

We have not started to specifically promote the program in Ontario. Generally our promotion within a province starts when our plan is ‘approved’; we then plan a launch event that is supported with newspaper advertising.

When we launched in Nova Scotia in January that was seen by many as our national launch. The announcement in Nova Scotia garnered national exposure for the program including pick-ups in Ontario publications.

**What percentage of cell phones supplied into the market are available for recycling in that year?**

Given that cell phones have existed for 25 years there is a potential for a lot to be available from a historic perspective. We have built a Life Cycle Model to try to gauge this. We are also still working to determine what might be available as a result of phones supplied into the market for 2009.

**Do you expect to see a large increase in the amount the program collects in the first year?**

It is difficult to determine what the answer is in relation to that question. The carriers have been operating programs of their own for some time now so the programs themselves are not new. We are interested to see how many hand-sets were recovered in 2009 – this information is currently being compiled by the processors – and how that compares to previous years. Our sense is that the program will have an impact but it's not clear how much. We have to remember what our consumer studies tell us: that consumers are reluctant to hand in their old phones and that they often make their way into a drawer and are forgotten.

**How are you addressing the issue of accessibility in Northern Ontario?**

Generally speaking, our drop-off sites are located in areas where cell phone coverage exists; if you can use your phone you can recycle it through one of the carriers' retailers. We also have several mail-back options that should address the needs of those in more remote areas of the province.

**Have you mapped out which areas of the province don't have cell service and overlaid your collection locations?**

No, we have not undertaken this exercise yet.

**How much cross-over does your program have with battery collection? Do most consumers turn in their battery with their phone?**

Our program accepts the battery with the phone at time of recycling. Consumers do not differentiate the battery in the phone as a separate item. We also accept the accessories that come with the phone.

There is a cross-over with the program run by RBRCC plus numerous 3rd parties that are interested in collecting phones because of the value they hold.

**How would you target collections to compete against 3<sup>rd</sup> party programs and meet your target?**

We are not looking to compete against 3<sup>rd</sup> party programs that use cell phone collection to raise funds for their various programs. Rather, we are looking for ways to try to include them in our program so that they still receive the benefits but we are able to include their collection numbers and ensure the phones are recycled responsibly.

In terms of parties like RBRCC, we have had discussions to determine how we would share data to get a better idea of actual amount of product that is recovered. It would be up to the regulator to determine how this information is reported back to them.

We are proposing targets that we believe we can meet.

**What % of units available for recovery are recovered?**

We estimated that we recovered 14% of what was available for collection in 2008; in 2009 we estimated that 18% of what is available for collection will be recovered.

## Appendix J, Questions from WDO



December 3, 2009

Mr. Emmanuel Morin  
Canadian Wireless Telecommunications Association  
1110-130 Albert Street  
Ottawa, Ontario K1P 5G4

Dear Mr. Morin:

**RE: Questions Arising from Draft Industry Stewardship Plan**

Thank you for submission of the Industry Stewardship Plan (ISP) dated November 17, 2009.

Questions arising from WDO's review of your ISP are appended. We would welcome an opportunity to meet with you to discuss these issues and any other topics of interest to you related to your ISP at your earliest convenience. Please contact my assistant, Laura Price at 416 226 5113 ext 298 or [lauraprice@wdo.ca](mailto:lauraprice@wdo.ca), to arrange a convenient time to meet.

I look forward to receiving your responses to our questions so that the process of addressing any outstanding issues may proceed without delay.

Yours truly,  
Waste Diversion Ontario

A handwritten signature in black ink that reads "Glenda Gies".

Glenda Gies  
Executive Director





1. Regarding the brands that are currently covered by Recycle My Cell:
  - a. What proportion of total sales of cellular phones into the Ontario marketplace do these members represent?
  - b. Which brands are not covered by Recycle My Cell?
  - c. Which brands currently covered by Recycle My Cell are obligated Brand Owners and First Importers under the Revised (Phase 1 and 2) WEEE Program Plan Rules for Stewards?
  - d. Which of the Recycle My Cell Programs operated by individual members listed in Appendix A, Table 3 are applicable/available to Ontario residents and IC&I generators of cellular devices?
2. The Revised (Phase 1 and 2) WEEE Program Plan Rules for Stewards includes a category called Cellular Devices and Pagers which is defined as "A handheld communication device that utilizes cellular networks to transmit voice or data signals. Includes cell-enabled Personal Digital Assistants (PDAs)." Examples of the products included in this category are: cellular phones; cellular phones offering camera, video, recording and/or audio functions; smart phones (cell-enabled); palmtop computers (cell-enabled); cell-enabled PDAs utilizing touch-screen technology; cell-enabled handheld devices; and pagers. Please advise if the ISP covers all cellular devices and pagers.
3. A number of the service providers used by Recycle My Cell are registered service providers with Ontario Electronic Stewardship (OES). Please provide the vendor standards and audit protocol for service providers used by Recycle My Cell that are not registered OES service providers.
4. Section 34(6) of the Waste Diversion Act (WDA) states that approval of an ISP by WDO exempts certain persons from the Rules for Stewards included in the IFO's approved program plan. These persons are a person who applied for the ISP or a person required by contract to participate in the plan who is a member of a class of persons described in the ISP as participants. Section 2.4 of the ISP states that CWTA does not enter into contracts with its members. Please advise if CWTA will enter into contracts with its members so that those members would be exempt from the IFO's Rules for Stewards if WDO were to approve the ISP.
5. Section 2.6 of the ISP makes reference to 'assist in the processing of mobile devices which do not fall under the responsibility of any obligated brand owner (orphan, historic and imported)'. Please describe the form of 'assistance'.
6. Section 2.8 of the ISP, in the final paragraph, indicates that Recycle My Cell will accept all mobile devices including those from non-participating brand owners while also stating that this should not be "utilized as an excuse to circumvent any applicable regulations and obligations laid out in the WDA and WEEE regulations". Please clarify this statement with respect to your expectations of WDO and OES and obligated brand owners and first importers who are not members of CWTA. Please also comment on the implications of this statement, given that Stewardship Ontario is the IFO responsible for Consumer-Type Portable Batteries, including rechargeable batteries in cellular devices and pagers and the implications if WDO were to approve the RBRCC ISP.
7. Section 2.10.1 indicates that "any municipal location, charity organization or corporate or private initiative that wishes to act as a collection site will be able to join the program as a collector". Please advise if these collectors will be reimbursed for their service or if a collection incentive will be offered.

Questions re CWTA ISP Submission Dated November 17, 2009

8. Please specifically identify the CWTA service providers that are acting as 'aggregating and sorting facilities' and which are acting as 'recycling and refurbishing facilities'.
9. Section 2.11.2 provides a list of data on page 15 that is tracked by the central sorting facility. Please advise if the number of units and the weight of units reused is also tracked.
10. Section 2.11.2 (page 15) states "96% of a mobile phone is recyclable" and "currently the only waste component is the rubber keypad". Please confirm that current recycling processes used by service providers to Recycle My Cell achieve a 96% material recycling efficiency. In other words, of the mobile phones entering the recycling process (not the refurbishment channel) by weight, 96% of the original input by weight is material destined for recycling into new products. How are the plastic components, i.e. printed circuit boards and housings, recycled into new products?
11. Section 2.11.3 indicates that 'products that meet the recyclers' requirements for resale are reintroduced into the market'. Please identify the criteria that comprise 'recyclers' requirements' and whether these items are reintroduced into the Ontario marketplace or outside of Ontario.
12. Under Section 2.13.3, CWTA indicates it 'fully supports the concept of Multiple Program Management with respect to co-operative and complementary recycling programs for end-of-life cell phones and related products in Ontario'. Please clarify the anticipated relationship between the CWTA ISP and these other recycling programs. Specifically, will CWTA assume responsibility for physically managing these materials in order to count these quantities towards CWTA ISP performance targets?
13. Do the data provided in Table 1 (page 25) represent:
  - a. the brands supplied into the Ontario market by brand owners that are members of Recycle My Cell that are subsequently available for collection during a specified year; or
  - b. all brands supplied into the Ontario market notwithstanding whether or not they are members of Recycle My Cell that are subsequently available for collection during a specified year.
14. Please provide the data in Table 1 (page 25) by units and by weight. Please indicate whether the weight of devices that is available for collection includes the weight of batteries within the devices?
15. Are the reported units collected/to be collected in Table 1 (page 25) exclusively from retail collection points and the mail in option offered under the Recycle My Cell Program? If no, what are the other sources of collected cellular devices (e.g. warranty replacement phones, from IC&I generators, etc.)?
16. Section 2.15.1, under Participation and Accessibility (page 28) indicates that "CWTA commits to establishing participation and accessibility targets after the program has been operational in Ontario for one year". WDO must consider whether the ISP achieves objectives that are similar to or better than the IFO's program plan. Without accessibility targets, WDO will be unable to assess whether the ISP includes accessibility targets that are similar to or better than the Revised (Phase 1 and 2) WEEE Program Plan. Please provide accessibility targets in the ISP submission.
17. Section 2.15.2 indicates that "consumer surveys will allow for comparative evaluation of the program from year one and beyond". To assess the effect of the ISP, baseline data would be required. Please advise if CWTA would implement baseline surveys prior to commencement of the ISP against which ISP performance can be measured.

Questions re CWTA ISP Submission Dated November 17, 2009

18. Table 2 sets out ISP data for quantities available for collection and collection targets for 2010 to 2013 while the Revised (Phase 1 and 2) WEEE Program Plan sets out targets for 2010 to 2014. Please provide the following data for the period 2010 through to and including 2014 to allow WDO to assess the objectives set out in the ISP with the objectives set out in the Revised (Phase 1 and 2) WEEE Program Plan:
  - a. accessibility targets
  - b. quantities available for collection in units and weight
  - c. collection targets in units and weight
  - d. reuse targets in units and weight
  - e. recycling targets in units and weight
    - i. as a percentage of quantities available for collection, and
    - ii. as a percentage of quantities collected net of items directed to reuse
19. Churn is defined in Section 2.15.1 (page 25) as “the number or proportion of subscribers who leave their carrier over a period of time”. This section suggests that churn data are a reasonable surrogate for the quantities of cellular devices that would be available for collection as these customers are “either becoming new subscribers at another carrier or not getting a new account”. The Life Cycle Model in Appendix F indicates that it utilizes churn data collected since 2001 as an input. However, Table 4 (page 79) indicates that the Life Cycle Model is based on the number of phones released into the market and the first life and second life lifespans. Please clarify how churn data (i.e. subscribers who leave their carrier) are used in the Life Cycle Model. Please provide a working version of the Life Cycle Model including data inputs and associated explanation.
20. Does Recycle My Cell plan to enter into discussions and/or an agreement with Stewardship Ontario, as the IFO responsible for Consumer-Type Portable Batteries or with RBRCC, should WDO approve the RBRCC ISP, regarding cell phone batteries handled through the Recycle My Cell Program?
21. Appendix G # 37 (page 89) of CWTA’s response to OES posting of the Draft Revised WEEE Program Plan states that CWTA’s future ISP plan will encompass a specified list of information. Of this list, the following are not included in the ISP submitted by CWTA dated November 17, 2009: a.) A breakdown of quantity of equipment sold in Ontario, c.) Anticipated collection (for Year 5) and diversion targets for the first 5 years of the program. d.) Program accessibility targets to ensure the program is accessible and convenient for all Ontarians, including the proposed methodology for determining accessibility, e.) A list of benchmarks and performance measures used to ensure reuse, reduction and recycling, promote best practices and encourage the development of innovative diversion techniques, f.) Confirmation that all processors contracted by carriers meet EPSC’s vendor qualification standards, g.) A commitment to an annual audit of processors to ensure continued adherence to these standards, h.) A schedule for public consultations on the proposal, i.) A tracking and auditing mechanism for cell phones, from point-of-collection to final destination, including verification of processing, and separate tracking and auditing mechanisms to ensure overall program compliance, j.) Provisions for reporting Industrial, Commercial and Institutional (IC&I) collection, as distinct from consumer collection. Please ensure this information is included in the final ISP when submitted.

Questions re CWTA ISP Submission Dated November 17, 2009

## Response to Questions from WDO

### 1. Regarding the brands that are currently covered by Recycle My Cell:

#### a. What proportion of total sales of cellular phones into the Ontario marketplace do these members represent?

The vast majority, nearly 100% of total sales of cellular phones in the Ontario marketplace can be attributed to the represented carrier members. However, Recycle My Cell accepts all orphan, historic and imported mobile devices, as well as mobile devices from non-participating brand owners, when consumers return such product to the Recycle My Cell drop-off locations.

#### b. Which brands are not covered by Recycle My Cell?

The following sell wireless devices in Ontario and are not included in Recycle My Cell. Phones sold by any of these companies would still be accepted at any RMC drop-off location.

- Apple
- Cityfone
- RBC Talk and Save
- Primus
- PCMobile
- 711
- Sears

#### c. Which brands currently covered by Recycle My Cell are obligated Brand Owners and First Importers under the Revised (Phase 1 and 2) WEEE Program Plan Rules for Stewards?

See Sections 2.1 and 2.15.1.

It is understood that in Ontario the brand owner is the device manufacturer even if the device is dual branded (i.e. the device contains the name of both the carrier and the manufacturer). However, this is only true if the manufacturer is a “registered business” in Ontario. Where the manufacturer is not a registered business in Ontario the brand owner will be the carrier as the first importer.

#### d. Which of the Recycle My Cell Programs operated by individual members listed in Appendix A, Table 3 are applicable/available to Ontario residents and IC&I generators of cellular devices?

See Appendix A, Table 3.

Generally, when a corporate account provider swaps out the base of ‘installed’ handsets for an IC&I account, the old handsets are recovered and introduced to that carrier’s reuse/recycling stream.

### 2. The Revised (Phase 1 and 2) WEEE Program Plan Rules for Stewards includes a category called Cellular Devices and Pagers which is defined as “A handheld communication device that utilizes cellular networks to transmit voice or data

signals. Includes cell-enabled Personal Digital Assistants (PDAs).” Examples of the products included in this category are: cellular phones; cellular phones offering camera, video, recording and/or audio functions; smart phones (cell-enabled); palmtop computers (cell-enabled); cell-enabled PDAs utilizing touchscreen technology; cell-enabled handheld devices; and pagers. Please advise if the ISP covers all cellular devices and pagers.

See Section 2.8.

**3. A number of the service providers used by Recycle My Cell are registered service providers with Ontario Electronic Stewardship (OES). Please provide the vendor standards and audit protocol for service providers used by Recycle My Cell that are not registered OES service providers.**

The following processors are OES approved: FCM Recycling Inc.; Global Electric Electronic Processing (GEEP); Sims Recycling Solutions.

ReCellular has partnered with Sims Recycling Solutions to process all product that is collected in Canada. Since Sims is an OES certified primary processor/recycler they are obligated to ensure that all downstream processors, including ReCellular, comply with OES standards. Therefore, ReCellular is also currently covered by OES.

GREENTEC is currently an OES approved collector and consolidator and has started the certification process to become an OES approved processor. They currently hold an ISO 14001 certification.

**4. Section 34(6) of the Waste Diversion Act (WDA) states that approval of an ISP by WDO exempts certain persons from the Rules for Stewards included in the IFO’s approved program plan. These persons are a person who applied for the ISP or a person required by contract to participate in the plan who is a member of a class of persons described in the ISP as participants. Section 2.4 of the ISP states that CWTA does not enter into contracts with its members. Please advise if CWTA will enter into contracts with its members so that those members would be exempt from the IFO’s Rules for Stewards if WDO were to approve the ISP.**

See Section 2.4 and Appendix B.

**5. Section 2.6 of the ISP makes reference to ‘assist in the processing of mobile devices which do not fall under the responsibility of any obligated brand owner (orphan, historic and imported)’. Please describe the form of ‘assistance’.**

See Section 2.6.

**6. Section 2.8 of the ISP, in the final paragraph, indicates that Recycle My Cell will accept all mobile devices including those from non-participating brand owners while also stating that this should not be “utilized as an excuse to circumvent any applicable regulations and obligations laid out in the WDA and WEEE regulations”. Please clarify this statement with respect to your expectations of WDO and OES and obligated brand owners and first importers who are not members of CWTA. Please also comment on the implications of this statement,**

**given that Stewardship Ontario is the IFO responsible for Consumer-Type Portable Batteries, including rechargeable batteries in cellular devices and pagers and the implications if WDO were to approve the RBRCC ISP.**

While Recycle My Cell will accept orphan, historic and imported mobile devices, as well as mobile devices from non-participating brand owners, under no circumstances should the willingness and openness of CWTA to accept cellular product from non-participating brand owners, be utilized as an excuse to circumvent any regulations by brand owners that are not part of the CWTA's ISP. Simply stated, the fact that Recycle My Cell will accept any wireless device does not exempt non-participating brand owners from the obligations set out in the regulations.

If WDO approves the RBRCC ISP for Consumer-Type Portable Batteries RBRCC will become the ISP for such product in Ontario and will therefore absolve OES of their responsibility. RBRCC has indicated that they plan to collect and recycle any wireless device that is returned to them through their collection network, and we will do the same with any recyclable batteries that are included in the wireless devices returned through our collection sites. To this end, CWTA notes that to truck batteries and handsets back and forth between depots or processors would be costly, onerous and ultimately self-defeating for a program that seeks to reduce the environmental footprint of those products. Instead, CWTA proposes to share data, where it is available, on the number of batteries collected by RMC, and the number of cell phones collected by RBRCC (or any another steward, where applicable). Sharing information among stewards is far preferable, by any measure, to shipping materials back and forth among stewards.

**7. Section 2.10.1 indicates that “any municipal location, charity organization or corporate or private initiative that wishes to act as a collection site will be able to join the program as a collector”. Please advise if these collectors will be reimbursed for their service or if a collection incentive will be offered.**

No reimbursement or collection incentives are offered to collection sites.

**8. Please specifically identify the CWTA service providers that are acting as ‘aggregating and sorting facilities’ and which are acting as ‘recycling and refurbishing facilities’.**

Under its current OEC certification, GREENTEC acts as an aggregating and sorting facility. GREENTEC has the capacity to recycle and refurbish devices as well.

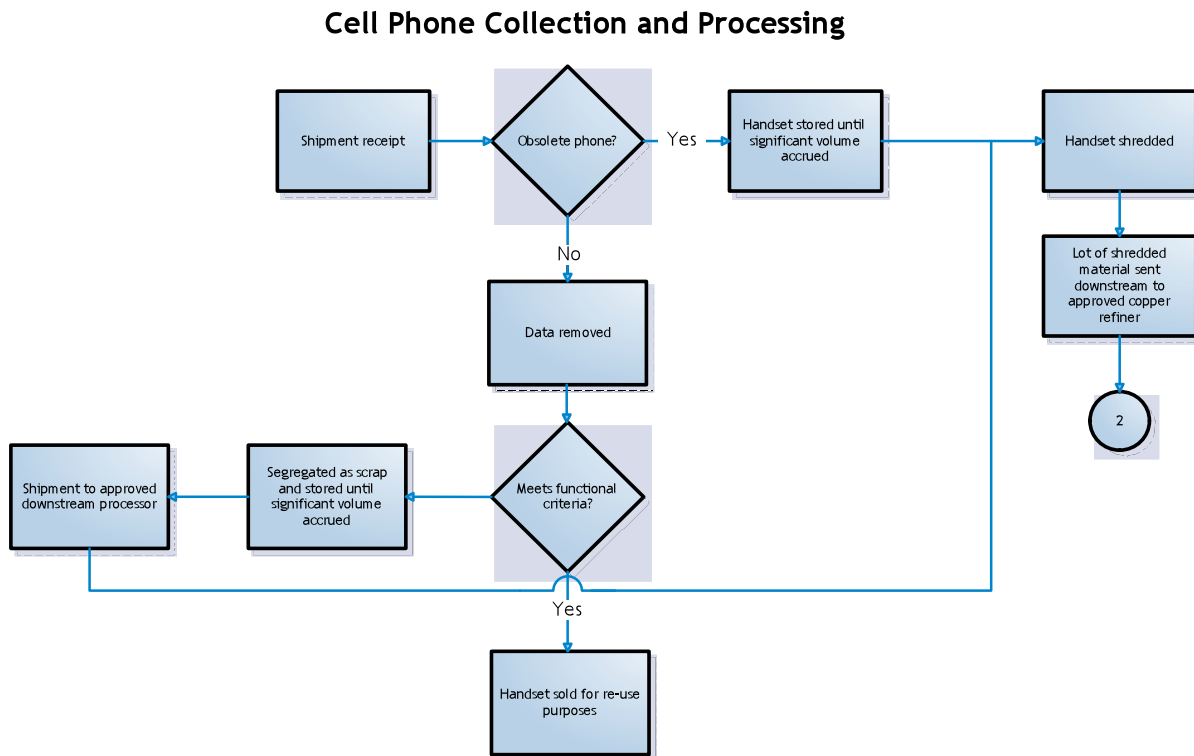
Sims Recycling Solutions acts as the aggregating, sorting and recycling facility for wireless devices that are collected through ReCellular programs in Canada. Once the devices are properly processed those that are considered reusable are shipped to ReCellular for further testing and they at that point act as an aggregating, sorting, recycling and refurbishment facility.

**9. Section 2.11.2 provides a list of data on page 15 that is tracked by the central sorting facility. Please advise if the number of units and the weight of units reused is also tracked.**

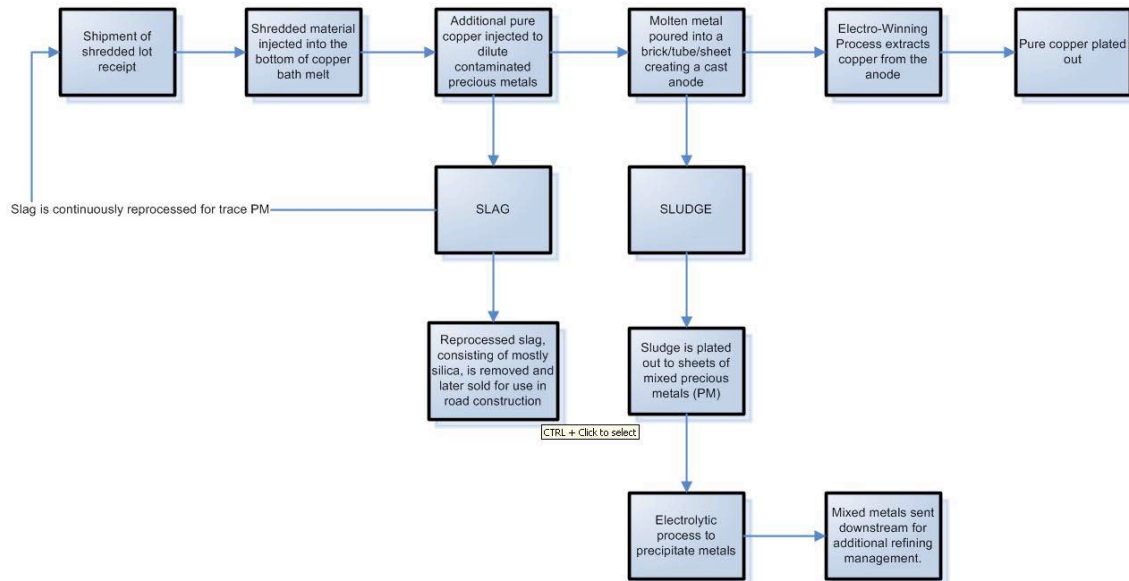
Wireless devices that are reused are tracked by unit and not weight. A weight estimation for wireless devices reused can be provided by simply multiplying number of units by 0.2kg per unit.

**10. Section 2.11.2 (page 15) states “96% of a mobile phone is recyclable” and “currently the only waste component is the rubber keypad”. Please confirm that current recycling processes used by service providers to Recycle My Cell achieve a 96% material recycling efficiency. In other words, of the mobile phones entering the recycling process (not the refurbishment channel) by weight, 96% of the original input by weight is material destined for recycling into new products. How are the plastic components, i.e. printed circuit boards and housings, recycled into new products?**  
See Section 2.12.2.

Process Flows:



### Precious Metal Downstream Refining Process: Cell Phones



**11. Section 2.11.3 indicates that ‘products that meet the recyclers’ requirements for resale are reintroduced into the market’. Please identify the criteria that comprise ‘recyclers’ requirements’ and whether these items are reintroduced into the Ontario marketplace or outside of Ontario.**

See Section 2.11.3

**12. Under Section 2.13.3, CWTA indicates it ‘fully supports the concept of Multiple Program Management with respect to co-operative and complementary recycling programs for end-of life cell phones and related products in Ontario’. Please clarify the anticipated relationship between the CWTA ISP and these other recycling programs. Specifically, will CWTA assume responsibility for physically managing these materials in order to count these quantities towards CWTA ISP performance targets?**

As noted above, CWTA is willing to share relevant data, where it is available, with other approved ISPs in order to allow for accurate reporting metrics and prefers this approach to that of physically shipping materials between ISPs.

**13. Do the data provided in Table 1 (page 25) represent: a. the brands supplied into the Ontario market by brand owners that are members of Recycle My Cell hat are subsequently available for collection during a specified year; or b. all brands supplied into the Ontario market notwithstanding whether or not they are members of Recycle My Cell hat are subsequently available for collection during a specified year.**

The data provided in Table 1 represent (a) the brands supplied into the Ontario market by brand owners that are members of Recycle My Cell that are subsequently available for collection during a specified year.



**14. Please provide the data in Table 1 (page 25) by units and by weight. Please indicate whether the weight of devices that is available for collection includes the weight of batteries within the devices?**

See Section 2.15.2.

The weight of devices available for collection includes the weight of batteries within the devices.

**15. Are the reported units collected/to be collected in Table 1 (page 25) exclusively from retail collection points and the mail in option offered under the Recycle My Cell Program? If no, what are the other sources of collected cellular devices (e.g. warranty replacement phones, from IC&I generators, etc.)?**

Reported units collected/to be collected include any devices that are collected through RMC collection points (including any returned by IC&I generators) and through the mail-back option. No other sources are included in this data.

**16. Section 2.15.1, under Participation and Accessibility (page 28) indicates that “CWTA commits to establishing participation and accessibility targets after the program has been operational in Ontario for one year”. WDO must consider whether the ISP achieves objectives that are similar to or better than the IFO’s program plan. Without accessibility targets, WDO will be unable to assess whether the ISP includes accessibility targets that are similar to or better than the Revised (Phase 1 and 2) WEEE Program Plan. Please provide accessibility targets in the ISP submission.**

See Section 2.15.2 (Participation and accessibility).

In OES’ Final Revised (Phase 1 and 2) Waste Electrical and Electronic Equipment (WEEE) Program Plan – July 10, 2009 – *Table 5.1: Five-year Anticipated Accessibility Targets for Phase 1 and 2 WEEE Collection*, they note that by year 5 they anticipate having 578 permanent collection sites (448 public sites and 130 non-public sites).

The CWTA ISP in comparison has, at the time of plan submission, more than 970 established drop-off locations in 126 communities in Ontario. The vast majority of Ontarians, more than 80%, live within 15 km of a collection point. The Recycle My Cell level of accessibility at time of launch is already superior to what OES proposes for year 5. The CWTA expects the number of locations to grow by 1% per year.

In addition, consumers also have access to 4 different pre-paid mail back options which they can access through [recyclemycell.ca](http://recyclemycell.ca). This allows 24/7 accessibility to the program.

**17. Section 2.15.2 indicates that “consumer surveys will allow for comparative evaluation of the program from year one and beyond”. To assess the effect of the ISP, baseline data would be required. Please advise if CWTA would implement baseline surveys prior to commencement of the ISP against which ISP performance can be measured.**

A baseline study was conducted in November 2009.

**18. Table 2 sets out ISP data for quantities available for collection and collection targets for 2010 to 2013 while the Revised (Phase 1 and 2) WEEE Program Plan sets out targets for 2010 to 2014. Please provide the following data for the period 2010 through to and including 2014 to allow WDO to assess the objectives set out in the ISP with the objectives set out in the Revised (Phase 1 and 2) WEEE Program Plan:**

**a. accessibility targets**

See Section 2.15.2 (Participation and accessibility).

**b. quantities available for collection in units and weight**

See Section 2.15.2 (Product Collection).

**c. collection targets in units and weight**

See Section 2.15.2 (Product Collection).

**d. reuse targets in units and weight**

See Section 2.15.2 (Diversion).

**e. recycling targets in units and weight**

**i. as a percentage of quantities available for collection, and**

**ii. as a percentage of quantities collected net of items directed to reuse**

See Section 2.15.2 (Diversion).

**19. Churn is defined in Section 2.15.1 (page 25) as “the number or proportion of subscribers who leave their carrier over a period of time”. This section suggests that churn data are a reasonable surrogate for the quantities of cellular devices that would be available for collection as these customers are “either becoming new subscribers at another carrier or not getting a new account”. The Life Cycle Model in Appendix F indicates that it utilizes churn data collected since 2001 as an input. However, Table 4 (page 79) indicates that the Life Cycle Model is based on the number of phones released into the market and the first life and second life lifespans. Please clarify how churn data (i.e. subscribers who leave their carrier) are used in the Life Cycle Model. Please provide a working version of the Life Cycle Model including data inputs and associated explanation.**

See Section 2.15.1.

A working model of the Life Cycle Model will be provided in confidence to WDO.

**20. Does Recycle My Cell plan to enter into discussions and/or an agreement with Stewardship Ontario, as the IFO responsible for Consumer-Type Portable Batteries or with RBRCC, should WDO approve the RBRCC ISP, regarding cell phone batteries handled through the Recycle My Cell Program?**

The CWTA is willing to share relevant data with other approved ISPs in order to allow for accurate reporting metrics and prefers this approach to that of physically shipping materials between ISPs.

**21. Appendix G # 37 (page 89) of CWTA's response to OES posting of the Draft Revised WEEE Program Plan states that CWTA's future ISP plan will encompass a specified list of information. Of this list, the following are not included in the ISP submitted by CWTA dated November 17, 2009:**

**a.) A breakdown of quantity of equipment sold in Ontario,**  
See Section 2.15.1.

**c.) Anticipated collection (for Year 5) and diversion targets for the first 5 years of the program.**

See Section 2.15.2.

**d.) Program accessibility targets to ensure the program is accessible and convenient for all Ontarians, including the proposed methodology for determining accessibility,**

See Section 2.15.2.

**e.) A list of benchmarks and performance measures used to ensure reuse, reduction and recycling, promote best practices and encourage the development of innovative diversion techniques,**

See Section 2.15.2.

**f.) Confirmation that all processors contracted by carriers meet EPSC's vendor qualification standards,**

Refer to response for Question 3 for confirmation of vendor certification under OES program.

**g.) A commitment to an annual audit of processors to ensure continued adherence to these standards,**

In order to receive their certifications processors must commit to regular audits. All OES approved processors must be re-assessed every 3 years after their original approval has expired.

**h.) A schedule for public consultations on the proposal,**

See section 2.16.

**i.) A tracking and auditing mechanism for cell phones, from point-of-collection to final destination, including verification of processing, and separate tracking and auditing mechanisms to ensure overall program compliance,**

See Sections 2.11.1, 2.11.2 and 2.11.3.

**j.) Provisions for reporting Industrial, Commercial and Institutional (IC&I) collection, as distinct from consumer collection. Please ensure this information is included in the final ISP when submitted.**

IC&I collections are collected through the same channels (RMC drop-off) as consumer collections and cannot be differentiated.

## Appendix K, Questions from Rechargeable Battery Recycling Corporation of Canada



December 8, 2009

Mr. J. David Farnes  
Vice President, Industry and Regulatory Affairs  
Canadian Wireless Telecommunications Association (CWTA)  
130 Albert Street, Suite 1110  
Ottawa, ON K1P5G4

Dear Mr. Farnes,

The following are comments of the Rechargeable Battery Recycling Corporation of Canada (RBRCC), which operates the Call2Recycle® program in Ontario, on the Canadian Wireless Telecommunications Association's (CWTA) industry stewardship plan (ISP), submitted for stakeholder consultation on November 17<sup>th</sup> 2009. Call2Recycle® has collected and processed batteries in Ontario since 1997 and cell phones since 2004. In 2009, Call2Recycle® expects to collect approximately 125,000 kg of rechargeable batteries and 30,000 cellphone units in Ontario. In addition, Call2Recycle® and RBRCC submitted an ISP – currently pending before Waste Diversion Ontario (WDO) -- to collect and recycle all rechargeable batteries in Ontario including those typically used in cell phones covered under CWTA's proposed plan.

We strongly support the concept of industry stewardship plans because it places the responsibility on the organizations and people who best understand the environmental, recycling and management issues and can ideally meet aspirations for recycling. We believe that our ISP reflects this point of view. Developing our ISP has provided us some unique insights into this responsibility and are included in the comments below.

**Targets.** "CWTA expects to see a collection rate of 25% in 2010 and commits to increasing the collection rate by an additional 5% per year up until 2014" (page 2). 25% of what? Total cell phones sold into Ontario? Total cell phones sold by its ISP members into the province? Total cell phones collected? Since the CWTA commits to collecting anyone's cell phone, how will it determine a collection rate if the above is solely a percentage of collection from its members? It is not clear to what CWTA has committed.

**Environmental Stewardship.** According to the plan, some of the potential cell phone processors are ISO 9001 or ISO 14001 certified. Likewise, some of these processors' "partners are likewise prohibited from sending e-waste to any country not belonging to the *European Union* or the *Organization of Economic Cooperation and Development (OECD)*, as directed by the *Basel Convention*" (page 18). Are there uniform recycling or handling standards for all processors and partners? What are they? How, for instance, is

P.O. Box 236 Station E Toronto, ON M6H 4E2 T. 1.888.224.9764 F. 1.888.902.7272 [www.call2recycle.org](http://www.call2recycle.org)

J. David Farnes

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shipping e-waste overseas "prohibited"? Have the processors been certified under the Basel Action Network (BAN) to demonstrate such compliance? Has the *program* (not the processor) been certified? While relying on processors certified by an independent body is generally positive, it would be strongly preferred if the program itself carried an independent certification.

**Privacy.** Pursuant to this last point, no where in the stated process for handling cell phones are there assurances that ALL individual information will be erased from both the unit and any SIM card used in the unit. Has CWTA committed to this? Where in the plan is it? We strongly urge that CWTA's program ensures that all personal information, whether it be deemed "confidential" or not, is properly erased from all units it collects under its program.

**Mail-in Program.** CWTA maintains a mail-in program for end-of-life cell phones and commits to "provide a detailed estimate for the number of mail-in devices originating from Ontario" (page 2). How is this "detailed estimate" calculated?

**Harvested Batteries.** CWTA's plan includes separating NiCd, NiMh, Li-ion and SSLA batteries from cellphone and accessory units (page 14). Since these batteries are materials covered under the Municipal Hazardous and Special Waste (MHSW) requirements, is CWTA's ISP envision that CWTA serve as the agent for the steward of this material? If Call2Recycle's ISP is accepted, will CWTA direct the batteries from the phones it collects to us? Will batteries be separately reported so proper calculation of collection targets for batteries are produced? Since none of the partners included in the plan are battery recyclers, how is CWTA proposing that this waste be processed? Call2Recycle® reiterates to CWTA its willingness to collect all batteries, including those included under CWTA's plan, pursuant to the provisions of the Call2Recycle® ISP. We believe that centralizing this activity adds both to the efficiency of the system and proper monitoring of collection and recycling results.

Similarly, Call2Recycle® intends to continue to collect cell phones in its program, although we are not seeking recognition of this activity as part of our ISP. Is CWTA seeking information on what cell phones we collect? What type of information will be required?

We believe that a resolution of the above issues is critical not only to the operation of CWTA's program but to the success of the Call2Recycle® program in the province. In the interest of maximizing the number of batteries and cell phones collected, and ensuring the proper end-of-life disposal requires an open and cooperative management of all of these issues.

P.O. Box 236 Station E Toronto, ON M6H 4E2 T. 1.888.224.9764 F. 1.888.902.7272 [www.call2recycle.org](http://www.call2recycle.org)

J. David Farnes

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We look forward to working with CWTA to further develop and attain approval of this industry stewardship plan. Please let us know what we can do to support these efforts.

Regards,



Carl E. Smith, LEED® AP

CEO / President

Call2Recycle®

Rechargeable Battery Recycling Corporation (RBRC)

Cc: Glenda Gies, Executive Director, Waste Diversion Ontario

## Response to Questions from Rechargeable Battery Recycling Corporation of Canada

**Targets:** “CWTA expects to see a collection rate of 25% in 2010 and commits to increasing the collection rate by an additional 5% per year up until 2014” (page 2). **25% of what? Total cell phones sold into Ontario? Total cell phones sold by its ISP members into the province? Total cell phones collected? Since the CWTA commits to collecting anyone’s cell phone, how will it determine a collection rate if the above is solely a percentage of collection from its members? It is not clear to what CWTA has committed.**

The collection rate of 25% refers to wireless devices Available for Collection from ISP members. See Section 2.15.1 for Table 1 **CWTA Available for Collection, Estimated Collection Targets and Collection Rate**. The collection targets contained in this Table have been revised.

The vast majority, nearly 100% of total sales of cellular phones in the Ontario marketplace can be attributed to the represented brand owner members.

**Environmental Stewardship:** According to the plan, some of the potential cell phone processors are ISO 9001 or ISO 14001 certified. Likewise, some of these processors’ “partners are likewise prohibited from sending e-waste to any country not belonging to the European Union or the Organization of Economic Cooperation and Development (OECD), as directed by the Basel Convention” (page 18). **Are there uniform recycling or handling standards for all processors and partners? What are they? How, for instance, is shipping e-waste overseas “prohibited”? Have the processors been certified under the Basel Action Network (BAN) to demonstrate such compliance? Has the program (not the processor) been certified? While relying on processors certified by an independent body is generally positive, it would be strongly preferred if the program itself carried an independent certification.**

All processors involved with the Recycle My Cell program are currently OES certified, or in the process of becoming OES certified. This certification imposes a uniform standard that all processors must comply with.

From the Final Revised (Phase 1 and 2) WEEE Program Plan – July 10, 2009: *“The OES Electronic Recycling Standard does not allow export of WEEE to countries that are not members of the Organisation for Economic Co-operation and Development (OECD) or the European Union, unless the primary processor can demonstrate that any/all downstream processors meet or exceed environmental, health and safety standards equal to Ontario requirements.”*

Recycle My Cell does not fit the parameters outlined for the BAN e-Stewards certification program as it is currently available to electronics scrap recyclers, refurbishers, asset managers, processors, and refiners located in the United States and Canada.

**Privacy: Pursuant to this last point, no where in the stated process for handling cell phones are there assurances that ALL individual information will be erased from both the unit and any SIM card used in the unit. Has CWTA committed to this? Where in the plan is it? We strongly urge that CWTA’s program ensures that all personal information, whether it be deemed “confidential” or not, is properly erased from all units it collects under its program.**

Consumers are responsible for the removal of their personal information. They must copy any information they need from their old device and reset its memory before dropping it off at a recycling location.

Information concerning the steps that consumers should take to delete their personal information before recycling their device, as well as a link to the Cell Phone Data Eraser, can be found on the Recycle My Cell consumer Web site, [www.recyclemycell.ca](http://www.recyclemycell.ca):

Contact Us :: Français

## Recycling Your Device?

- Overview
- Drop-off Locations
- Recycling Your Device?**
- Facts and Figures
- Participating Programs
- FAQs

### What you should know before recycling your device:

Before you mail or bring your mobile devices to a drop-off location, please ensure that:

1. The account for the device has been fully paid and service has been deactivated.
2. Any headsets and chargers for the device are included with your donation (These accessories also contain recyclable and salvageable materials).
3. The SIM card is removed if there is one.
4. If mailing your used device, be sure that the device and its accessories are packaged in a box or envelope using protective materials and securely attach a label to the box or envelope with its barcode visible.
5. Any personal information is erased from your device, including text messages, contacts and personal files. Phones cannot be reclaimed at a later date. ReCellular, Inc.'s [Cell Phone Data Eraser](#).

Click [here](#) to print a pre-paid shipping label offered by several Recycle My Cell partners.

[Privacy Policy](#) - [Terms of Use and Disclaimer](#)

In addition Section 2.12.2 outlines that recyclers also remove all personal information from phones that they certify for resale.



**Mail-in Program:** CWTA maintains a mail-in program for end-of-life cell phones and commits to “provide a detailed estimate for the number of mail-in devices originating from Ontario” (page 2). How is this “detailed estimate” calculated? The detailed estimate for mailed in devices is calculated by taking the actual national figure for devices received through this channel and estimating the proportion that might have originated from Ontario based on Ontario’s percentage of the national population.

**Harvested Batteries:** CWTA’s plan includes separating NiCd, NiMh, Li-ion and SSLA batteries from cellphone and accessory units (page 14). Since these batteries are materials covered under the Municipal Hazardous and Special Waste (MHSW) requirements, is CWTA’s ISP envision that CWTA serve as the agent for the steward of this material? If Call2Recycle’s ISP is accepted, will CWTA direct the batteries from the phones it collects to us? Will batteries be separately reported so proper calculation of collection targets for batteries are produced? Since none of the partners included in the plan are battery recyclers, how is CWTA proposing that this waste be processed? Call2Recycle® reiterates to CWTA its willingness to collect all batteries, including those included under CWTA’s plan, pursuant to the provisions of the Call2Recycle® ISP. We believe that centralizing this activity adds both to the efficiency of the system and proper monitoring of collection and recycling results.

**Similarly, Call2Recycle® intends to continue to collect cell phones in its program, although we are not seeking recognition of this activity as part of our ISP. Is CWTA seeking information on what cell phones we collect? What type of information will be required?**

Similar to the RBRCC intention to collect and recycle any wireless device that is returned to them through their collection network, Recycle My Cell will do the same with any recyclable batteries that are included in the wireless devices returned through our collection sites. To this end, CWTA notes that to truck batteries and handsets back and forth between depots or processors would be costly, onerous and ultimately self-defeating for a program that seeks to reduce the environmental footprint of those products. Instead, CWTA proposes to share data, where it is available, on the number of batteries collected by Recycle My Cell, and the number of cell phones collected by RBRCC (or any another steward, where applicable). Sharing information among stewards is far preferable, by any measure, to shipping materials back and forth among stewards.

Batteries collected through Recycle My Cell will be processed using OES approved downstream processors.

## Appendix L, CWTA Comments re: Posting 010-7162 Review of the Waste Electrical and Electronic Equipment Program



### Canadian Wireless Telecommunications Association comments re: Posting 010-7162 Review of the Waste Electrical and Electronic Equipment Program

August 14 2009

#### Executive Summary

- OES's baseline collection target of 835,000 cell phones is out of touch with the actual number of cell phones that were recycled in Ontario in recent years. For example, *Recycle My Cell* (RMC) collected approximately 140,000 cell phones in Ontario in 2008.
- How OES expects to start from a position of nearly 700,000 additional cell phones over what will realistically be recovered is not explained. CWTA has further questions about various OES projections and calculations as well. (see Appendix A).
- Fundamentally, CWTA questions why OES requires any fees at all to collect cell phones. RMC and numerous charities currently operate free recycling programs whose recycling revenues exceed their collection costs. OES's plan does not explain why OES expects that its costs will exceed its revenues, when the opposite is clearly true for all other cell phone recyclers in Canada.
- CWTA will submit a proposal for regulatory approval to operate RMC as a formal ISP in Ontario. That plan will be based on real figures, will reflect all necessary standards and reporting requirements, and will be free for government and consumers. Proceeds will support Ontario charities.
- In its ISP proposal, CWTA will take into account the fact that OES's proposed monthly reporting requirements will be logistically impossible to meet, as independent retailers do not make monthly reports to carriers or manufacturers. CWTA will propose more realistic reporting timelines, consistent with what has been approved in all other provinces where RMC has received regulatory approval.

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## 1. Introduction

1. The Canadian Wireless Telecommunications Association (CWTA) is grateful for the opportunity to comment on the Ontario Electronics Stewardship (OES) Final Revised Phase 1 & 2 Waste Electrical and Electronic Equipment (WEEE) Program Plan.
2. The Canadian Wireless Telecommunications Association (CWTA) is the authority on wireless issues, developments and trends in Canada. It represents cellular, PCS, messaging, mobile radio, fixed wireless and mobile satellite carriers as well as companies that develop and produce products and services for the industry.
3. CWTA currently operates the *Recycle My Cell* (RMC) program in every province in Canada. RMC is a national cell phone recycling program that draws together the recycling programs run by major wireless carriers and handset manufacturers. The national program was officially launched January 20 2009 in Nova Scotia, where CWTA received formal regulatory approval as the industry steward for wireless products. The program has since been recognized in four other provinces. CWTA expects to receive similar regulatory approval in all remaining provinces in 2009-2010.
4. RMC currently has 809 collection points in 124 communities across Ontario, and collected an estimated 140,000 phones in Ontario in 2008.
5. The numbers in OES's July program plan vary dramatically in some cases from numbers presented by OES in its April and May versions. No explanation is given for why critical indicators have been revised upwards and/or downwards, with little apparent rationale. Moreover, the July plan contains numerous unexplained discrepancies that lead CWTA to strongly question the basis for OES's overall methodology, and that undermine OES's case for any associated fees.

## 2. OES's inflated baseline undermines its entire formula

6. CWTA recognizes that numerous factors compound the challenge of setting precise available-for-collection figures for cell phones in any given province, at any given time. Simply put, the distribution of cell phones in Canada do not respect provincial borders. As noted by CWTA at earlier stages of this process:
  - a. International and out-of-province internet-orders, national corporate accounts that transfer thousands of phones to employees in different provinces, and the third-party reseller market make it next to impossible to accurately gauge the number of cell phones that exist in any province at any one time.
  - b. Numerous school and charity cell phone collection fundraisers and family and business "hand-me-downs" make it next to impossible to gauge the number of phones that have already been reused or recycled in any province.
7. While we recognize these challenge exist as OES attempts to project available-for-collection numbers for wireless devices, CWTA respectfully submits that OES's baseline figures are far removed from the reality in the marketplace, and that as the basis for the rest of their model, the plan's inflated baseline undermines the rest of OES's methodology and modeling.

8. In its July plan, OES sets the “baseline” for cell phone collections in Ontario at 835,000<sup>1</sup> explaining that “the per capita collection target results were compared against the actual and projected per capita collection results from other operating provincial programs, and were found to be similar.” Given that the plan goes on to set out Year 1 through Year 5 targets using that baseline as a starting point, CWTA interprets “baseline” to mean “the current number of phones to be collected in Ontario the year that OES’s plan begins operation.”
9. However, if this indeed the intended meaning, CWTA strongly questions the assumption that 835,000 cell phones will be recycled in Ontario in 2009. The CWTA’s recycling program collected 360,167 cell phones across all of Canada in 2008, including an estimated 140,000 in Ontario.
10. CWTA strongly submits that this 140,000 figure, rooted in actual experience in the marketplace, should be adopted as the baseline for any projections for cell phone collections in Ontario. Conversely, OES’s baseline inflates the actual baseline by nearly 650,000 units, without reasonable explanation. And given that this inflated baseline is the foundation for the rest of OES’s projections, CWTA submits that the rest of OES’s projection targets are similarly out of touch with any realistic projections.
11. Table 1 captures the inflated nature of OES’s projected collection targets, in light of their inflated baseline figure. CWTA believes that OES’s baseline is inflated by 430% based on our actual collection figures. The table applies that inflation factor to future years’ targets, to derive more realistic OES collection targets.<sup>2</sup>

**Table 1: Actual vs. projected cell phone collections in Ontario**

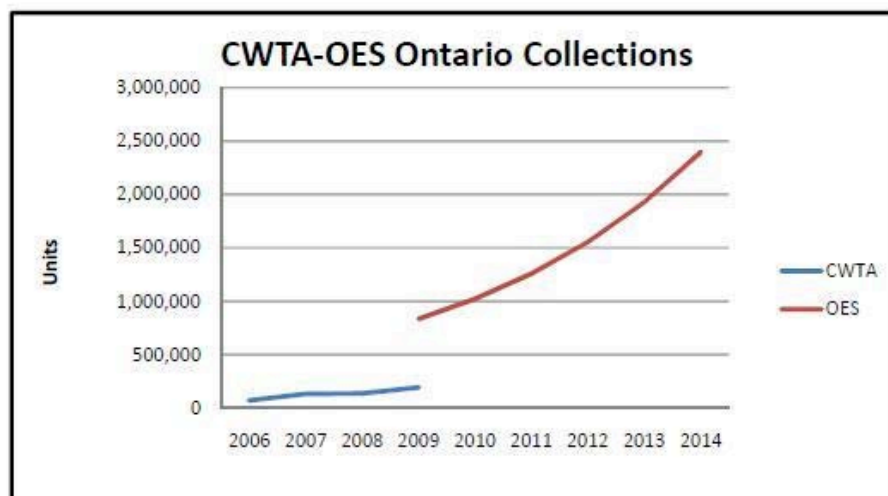
	CWTA (actual)	OES (projected)	Inflation		Realistic OES Collection Targets
			%	Units	
2006	72,932				
2007	132,691				
2008	139,853				
2009	194,150	835,000	430%	640,850	194,150
2010		1,025,000	430%	786,672	238,328
2011		1,260,000	430%	967,031	292,969
2012		1,555,000	430%	1,193,439	361,561
2013		1,930,000	430%	1,481,246	448,754
2014		2,395,000	430%	1,838,127	556,873

<sup>1</sup> 835,000 = 167 tonnes multiplied by 5000: there are 5000 units in 1 tonne given the 0.2kg/unit measurement provided by “Average Unit Weights” table found in OES’s April, May and July plans. The tonnage for OES’s baseline year was found in *Table 5.5: Five Year Projected Collection Targets (Tonnes)* of the July plan.

<sup>2</sup> CWTA estimates based on current national collection figures applying a population percentage. Table 1 applies the same tonnage-to-unit formula to OES collection targets as explained in footnote 1.

12. Table 2 expresses the unrealistic trend lines of OES's projected collection targets, as they depart from the actual picture in the marketplace today.

Table 2: OES projected collection growth curve vs. current actual growth curve



13. Notwithstanding the effect of OES's highly questionable baseline on the rest of the July's plan's formula, CWTA has specific concerns about various aspects of that formula. OES's projections and methodology leave many unanswered questions, and in some cases, the math simply does not add up.

**3. There are many unexplained variances in key indicators between April, May and July versions of OES's plan**

14. CWTA notes that the April, May and July 2009 versions of OES's plan project different many different indicators, without explanation as why its projections have veered up or down dramatically over only four months.
15. With respect to collection targets, the April version of OES's plan projects that 12,000,000 cell phones will be recovered by OES over 6 years.<sup>3</sup> In the May and July versions, that number had dropped to 9,000,000 – a reduction of 3,000,000 phones over 6 years that OES estimates it will collect. Yet OES never provides an explanation for why its collection target dropped 25% in one month between April and May 2009.

<sup>3</sup> The 12,000,000 number is calculated using the "Five Year Projected Collection Targets (tonnes)" table from the July plan and the other collection targets are from the same table in their respective plans. The tonnes were multiplied by 5000 since there are 5000 units in 1 tonne given the 0.2kg/unit measurement provided by "Average Unit Weights" table found in each of the three Plans.

**Table 3: Variances in collection targets between April, May and July versions of OES plan**

		Baseline	Year 1	Year 2	Year 3	Year 4	Year 5
<b>Collection Targets</b>	April	1,115,000	1,365,000	1,680,000	2,075,000	2,570,000	3,195,000
	May/July	835,000	1,025,000	1,260,000	1,555,000	1,930,000	2,395,000
Difference		280,000 less	340,000 less	420,000 less	520,000 less	640,000 less	800,000 less

16. With respect to available for collection numbers, in April OES projected that by Year 2 there will be 3,510,000 units available for collection in Ontario.<sup>4</sup> By May, OES projected that by Year 2 15,000 fewer units would be available, without any explanation as to why it adjusted its projections downward.
17. Similarly, the April version projects that by Year 3, 4,080,000 units will be available for collection in Ontario. A month later that number was revised downward by 110,000 units. Then in July, it was re-revised upwards by 60,000 units, again without any explanation.
18. These are only two examples of the many 'available for collection' variations that occur between different versions of OES's plan, all within a few months, and all without any transparency as to OES's methodology or conclusions drawn.

**Table 4: Variances in available for collection numbers between April, May and July versions of OES plan**

		Baseline	Year 1	Year 2	Year 3	Year 4	Year 5
<b>Available for Collection</b>	April	2,790,000	3,115,000	3,510,000	4,080,000	4,760,000	5,760,000
	May	2,790,000	3,115,000	3,495,000	3,970,000	4,445,000	4,785,000
	July	2,790,000	3,115,000	3,495,000	4,030,000	4,630,000	5,425,000
Cumulative Difference April-July		-	-	<	<	<	<

19. With respect to supplied for use numbers, there are again significant variations in both tonnage and unit numbers between the April, May and July versions of OES's plan, indicating that significant adjustments have been made to the model, but again, without any explanation as to why these numbers vary from version to version.
20. CWTA is more concerned, however, that the supplied for use tonnage and unit numbers do not correspond when the standard weight-per-unit (0.2kg) is applied to the projections.

<sup>4</sup> Calculated using the "Available for Collection (tonnes)" table from the July plan and the other available for collection numbers are from the same table in their respective plans. The tonnes were multiplied by 5000 since there are 5000 units in 1 tonne given the 0.2kg/unit measurement provided by "Average Unit Weights" table found in each of the three Plans.

21. Throughout its plan, OES provides two versions of its supplied for use number - one expressed in tonnage, the other in units. As noted, the constant is supposed to be the per-unit weight of 0.2kg per cell phone, meaning that there should always be 5000 units per tonne. However, simple division of OES's tonnage projections by standard per-unit weight produces different numbers of units.<sup>5</sup>
22. For example, looking at OES's baseline year, units given are 4,911,000, which should equal 982.2 tonnes. However, tonnes given are 979, which should equal 4,895,000 units. In other words, there is a 15,000 unit discrepancy when OES's baseline supplied for use number is expressed as tonnes vs. units.
23. On average, OES's per-unit projections contain 20,000 more units each year than its by-weight projections. Cumulatively, OES is projecting that it will collect over 110,000 more units than it has accounted for in its tonnage calculations.
24. The effect is the same as saying that OES will collect 10 pounds of apples, each apple weighing one pound, for a total of 12 apples. The math simply does not add up.

**Table 4.1: discrepancies between supplied for use numbers when expressed in tonnage or unit terms (April version)**

April			kg/Unit	Extra phones when calculated per Unit
Base Year	Units	4,911,000	0.199348402	16,000
	Tonnes	979		
Year One	Units	5,944,000	0.199528937	14,000
	Tonnes	1,186		
Year Two	Units	7,378,000	0.199647601	13,000
	Tonnes	1,473		
Year Three	Units	9,416,000	0.199872557	6,000
	Tonnes	1,882		
Year Four	Units	12,372,000	0.199886841	7,000
	Tonnes	2,473		
Year Five	Units	16,732,000	0.199916328	7,000
	Tonnes	3,345		

<sup>5</sup> In tables 4.1 and 4.2 the tonnage is taken from the "Supplied for Use in Ontario (tonnes)" table and the Units were taken from the "Supplied for Use in Ontario (Units)" table found in each respective plan. The tonnes were converted into kg's which were then divided by the units given which produced the weight per unit (kg's/unit). Since the weight/unit that is used by OES was not the 0.2kg that was stated in the "Average Unit Weights" table found in each of the three Plans, the result on average is a discrepancy of 20,000 units.

Table 4.2 (May/July versions)

May/July			kg/Unit	Extra phones when calculated per Unit
Base Year	Units	4,764,000	0.199202351	19,000
	Tonnes	949		
Year One	Units	4,812,000	0.199293433	17,000
	Tonnes	959		
Year Two	Units	4,860,000	0.199176955	20,000
	Tonnes	968		
Year Three	Units	4,957,000	0.199314101	17,000
	Tonnes	988		
Year Four	Units	5,106,000	0.199177438	21,000
	Tonnes	1,017		
Year Five	Units	5,259,000	0.199277429	19,000
	Tonnes	1,048		

#### 4. Deviations between OES and Statistics Canada population projections

25. OES claims to use Statistics Canada population growth projections for its Kg per capita and tonnage recycling targets. However the population growth projections in OES's plan do not correspond to actual Statistics Canada projections.<sup>6</sup>
26. For example, CWTA notes that there is a section below the Five Year Projected Recycling Targets (Kg per capita) table in the April, May and July plans stating "The per capita collection targets . . . were then multiplied by the projected population for Ontario for 2009 – 2014, *as per Statistics Canada.*" (emphasis added)
27. However, there are large variations between Statistics Canada's actual population projections and those included in that section of OES's plans. In fact, the population used by OES in its Five Year Recycling Targets in Tonnes actually *goes down* in several instances (see blue highlighted boxes), and again fluctuates between April, May and July versions of OES's plan.
28. There is no explanation for why OES projects that Ontario's population will variously increase (or decrease) across the April, May or July versions of its plan, or why its projections differ from its stated Statistics Canada source.
29. Moreover, both the Five Year Projected Recycling Targets (Kg per capita) and the Five Year Projected Collection Targets (tonnes) claim to be calculated using the same Statistics Canada source, but actually use different population numbers than Statistics Canada, *and from each other*. Again, these discrepancies are never explained.

<sup>6</sup> See <http://www.statcan.gc.ca/pub/91-520-x/91-520-x2001001-eng.pdf>



**Table 5.1: deviations between OES and Statistics Canada for Five Year Projected Recycling Targets (Kg per capita) (April version)**

April			Population (OES)	Population (Stats Can)
Base Year	kg/Capita	0.013	13,307,692	12,703,600
	Tonnes	173		
Year One	kg/Capita	0.017	12,823,529	12,796,600
	Tonnes	218		
Year Two	kg/Capita	0.021	13,190,476	12,887,500
	Tonnes	277		
Year Three	kg/Capita	0.026	13,576,923	12,976,000
	Tonnes	353		
Year Four	kg/Capita	0.033	13,636,364	13,062,400
	Tonnes	450		
Year Five	kg/Capita	0.042	13,690,476	13,146,600
	Tonnes	575		

**Table 5.2 deviations between OES' and Statistics Canada for Five Year Projected Recycling Targets (Kg per capita) (May and July versions)**

May/July			Population	Population (stats Can)
Base Year	kg/Capita	0.010	13,000,000	12,703,600
	Tonnes	130		
Year One	kg/Capita	0.012	13,666,667	12,796,600
	Tonnes	164		
Year Two	kg/Capita	0.016	13,000,000	12,887,500
	Tonnes	208		
Year Three	kg/Capita	0.020	13,200,000	12,976,000
	Tonnes	264		
Year Four	kg/Capita	0.025	13,480,000	13,062,400
	Tonnes	337		
Year Five	kg/Capita	0.031	13,903,226	13,146,600
	Tonnes	431		

**Table 5.3 deviations between OES and Statistics Canada for Five Year Projected Collection Targets (tonnes) source (April version)**

April			Population (OES)	Population (Stats Can)
Base Year	kg/Capita	0.017	13,117,647	12,703,600
	Tonnes	223		
Year One	kg/Capita	0.021	13,000,000	12,796,600
	Tonnes	273		
Year Two	kg/Capita	0.025	13,440,000	12,887,500
	Tonnes	336		
Year Three	kg/Capita	0.031	13,387,097	12,976,000
	Tonnes	415		
Year Four	kg/Capita	0.038	13,526,316	13,062,400
	Tonnes	514		
Year Five	kg/Capita	0.047	13,595,745	13,146,600
	Tonnes	639		

**Table 5.4 deviations between OES and Statistics Canada for Five Year Projected Collection Targets (tonnes) (May and July versions)**

May/July			Population	Population (stats Can)
Base Year	kg/Capita	0.013	12,846,154	12,703,600
	Tonnes	167		
Year One	kg/Capita	0.016	12,812,500	12,796,600
	Tonnes	205		
Year Two	kg/Capita	0.019	13,263,158	12,887,500
	Tonnes	252		
Year Three	kg/Capita	0.023	13,521,739	12,976,000
	Tonnes	311		
Year Four	kg/Capita	0.028	13,785,714	13,062,400
	Tonnes	386		
Year Five	kg/Capita	0.035	13,685,714	13,146,600
	Tonnes	479		

**5. There is no need for OES to extract any fees from consumers or industry to cover its cell phone collection and/or recycling costs**

30. To recap, there are wide variations between supposedly identical indicators in different versions of OES's plan; OES's tonnage projections differ from its unit projections when simple per-unit weight division is applied; OES's population projections do not reflect their stated source (Statistics Canada), and imply that Ontario's population will expand, contract, and expand again seemingly at random. In light of these numerous inconsistencies in OES's plan, CWTA does not have confidence that any fees proposed by OES will reflect its actual costs.
31. More to the point however, CWTA maintains that it is not necessary to apply any new taxes or fees whatsoever to the collection of cell phones in Ontario.
32. In *Recycle My Cell*, a free option already exists for Ontarians who wish to recycle their cell phones and related devices. RMC offers hundreds of additional storefront locations for recycling than OES depots would. And the proceeds of RMC directly supports Ontario charities, as opposed to supporting WDO and OES bureaucracy.
33. RMC and numerous Ontario charities manage to collect cell phones on a profitable basis without subsidizing their operations by way of any fees at all: OES has failed to demonstrate why, under its model, the cost of collecting cell phones will be greater than the revenues it derives from their sale to processors--especially when the opposite is true for all other cell phone recyclers in Canada.
34. CWTA has no objection whatsoever to OES collecting phones at its depots while participating RMC dealers collect cell phones at retail outlets - just as we remain supportive of individual charities that collect cell phones as fundraisers. At the end of the day, we all share a common goal: diverting cell phones from landfills.
35. But CWTA emphasizes that there is no reasonable justification for OES to assess consumer or industry fees collect cell phones for recycling cell phones. The collection of cell phones by RMC and charities is at minimum a break-even proposition unto itself, without the benefit of arbitrary fees or subsidies. This will be also be true for any cell phones OES may wish to collect at its depots.

**6. CWTA will present an ISP plan at the earliest possible opportunity**

36. In light of our numerous concerns with OES's plan, CWTA intends to submit its own Individual Stewardship Plan (ISP) in the coming months. In the meantime, CWTA will continue to work with its members to develop actual 'available for collection' numbers against which reasonable and attainable targets will be proposed. CWTA has been engaged in this process for many months, and is working to overcome the challenges noted above to develop solid 'Ontario numbers'.
37. CWTA's plan will encompass:
  - a. A breakdown of quantity of equipment sold in Ontario;
  - b. An indication of the quantity of waste already collected under the Recycle My Cell program;
  - c. Anticipated collection and diversion targets for first five years of program;

- d. Program accessibility targets to ensure the program is accessible and convenient for all Ontarians, including the proposed methodology for determining accessibility;
  - e. A list of benchmarks and performance measures used to encourage reuse, reduction and recycling (the 3 Rs), promote best practices and encourage the development of innovative diversion techniques;
  - f. Confirmation that all processors contracted by carriers meet EPSC's vendor qualification standards;
  - g. A commitment to an annual audit of processors to ensure continued adherence to these standards;
  - h. A schedule for public consultations on the proposal;
  - i. A tracking and auditing mechanism for cell phones, from point-of-collection to final destination, including verification of processing, and separate tracking and audit mechanisms to ensure overall program compliance;
  - j. Provisions for reporting Industrial, Commercial and Institutional (ICI) collection, as distinct from consumer collection;
  - k. An aggressive consumer awareness campaign.
38. With respect to reporting timelines, CWTA's plan will take into account the fact that independent retailers do not make monthly sales reports to carriers or manufacturers. That data is simply not available on a monthly basis. This could result in monthly reports that are perpetually incomplete and not reflective of actual activity in the marketplace. A more reasonable reporting framework will be proposed, consistent with what has been approved in other provinces where RMC has received regulatory approval.
39. And of course, CWTA's program will be free to consumers, to government, and its proceeds will benefit local charities.
40. CWTA appreciates the opportunity to provide its comments on this important proceeding.

\*\*\*\*End of Document\*\*\*\*