



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

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

**As Submitted for Stakeholder Consultation  
on November 17, 2009**

**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, 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 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 25% in 2010 and commits to working toward increasing the collection rate by an additional 5% per year up until 2014.
- CWTA expects to increase **awareness** of cell phone recycling among cell phone owners/intenders nationally to 60% by September 2010 and to 80% by 2015.
- CWTA expects to see 100% **customer satisfaction** with the Recycle My Cell program.

In addition, the CWTA commits to establishing **participation and accessibility** targets, as well as a baseline for future **diversion** targets, after the program has been operational in Ontario for one year.

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 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 target setting 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 and consumer awareness.

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 April 2008 CWTA commissioned a *Harris/Decima* study on cellular phone recycling in Canada. Over 1,300 Canadians 18 years and older were contacted to participate in this telephone survey.

The survey found<sup>1</sup> that most Canadians expect the lifespan of their cellular phones to be 2.5 years. Among Canadians who have previously owned a cellular phone, 12% recycled their last phone, 19% gave it away or sold it, and 8% threw their old cellular phone out. Not surprisingly, 36% 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 11% were keeping it for a future need. On average, Canadians typically store their old cellular phones for 15 months.

The survey also found a significant majority of Canadians (85%) are likely to use a cellular phone recycling program if one were introduced in the area and an average of one cellular phone per "interested" household would be recycled immediately. The most recognized recycling programs are those run by cellular phone providers (24%).

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,

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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%

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*.

In addition, Canada's wireless carriers all partner with recyclers 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 are currently covered by the CWTA stewardship plan:

*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

*MTS*

Fred Riddle  
Manager Environment Programs  
*MTS Allstream*

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

*SaskTel*

Jodi Smith  
Manager, Community Relations  
*SaskTel*

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

*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*

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*Videotron*

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

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

*Virgin Mobile Canada*

Edin Mesic  
Director, Supply Chain  
*Virgin Mobile Canada*

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

### **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:

*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](mailto:info@recyclemycell.ca) / [info@recyclemoncell.ca](mailto:info@recyclemoncell.ca)

[www.recyclemycell.ca](http://www.recyclemycell.ca) / [www.recyclemoncell.ca](http://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. CWTA is the collective voice of our members and we have operated successfully in this manner on many previous projects.

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 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;
- Regular 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;
- 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;
- Assist in the processing of 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. 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.

## **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**

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.

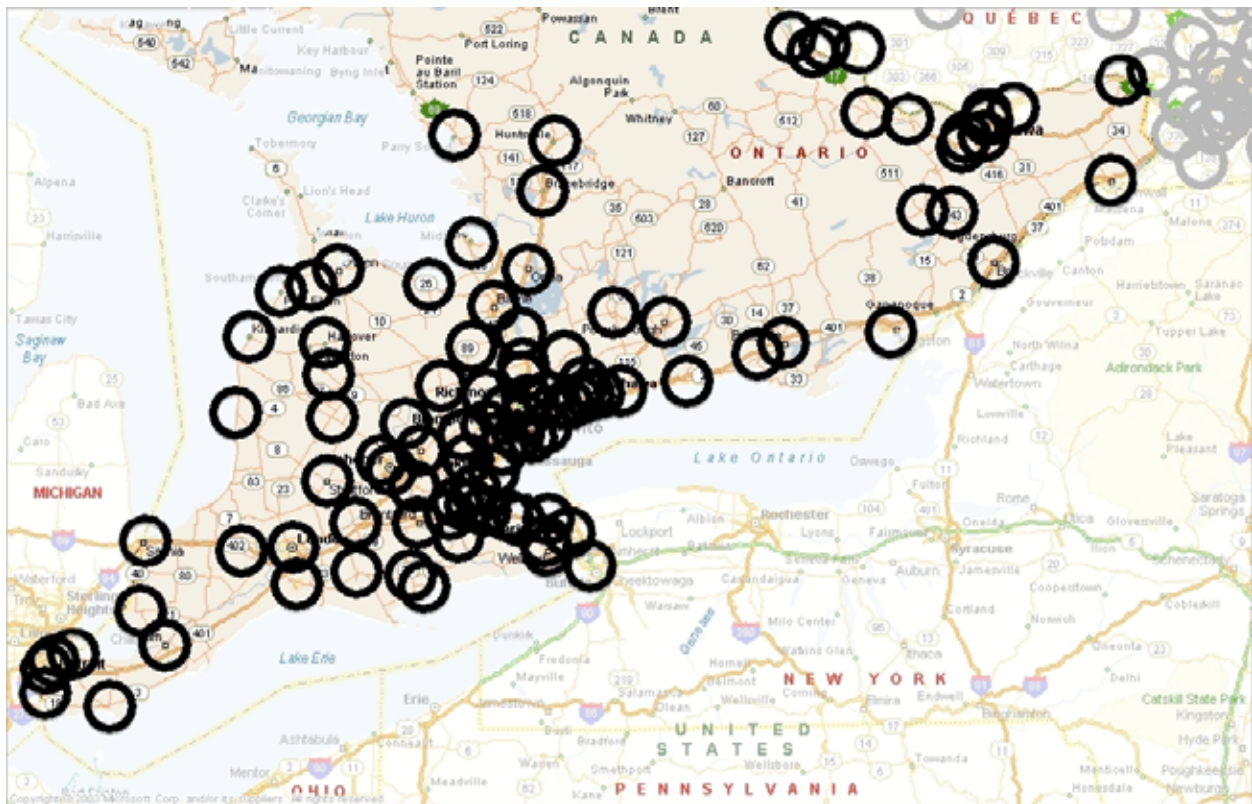
There are currently more than 970 drop-off locations in 126 communities across the province of Ontario. The Recycle My Cell network of collection sites is continually evolving and expanding as more retailers and brand owners join the program, and as companies introduce new retail stores and dealerships 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 and 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

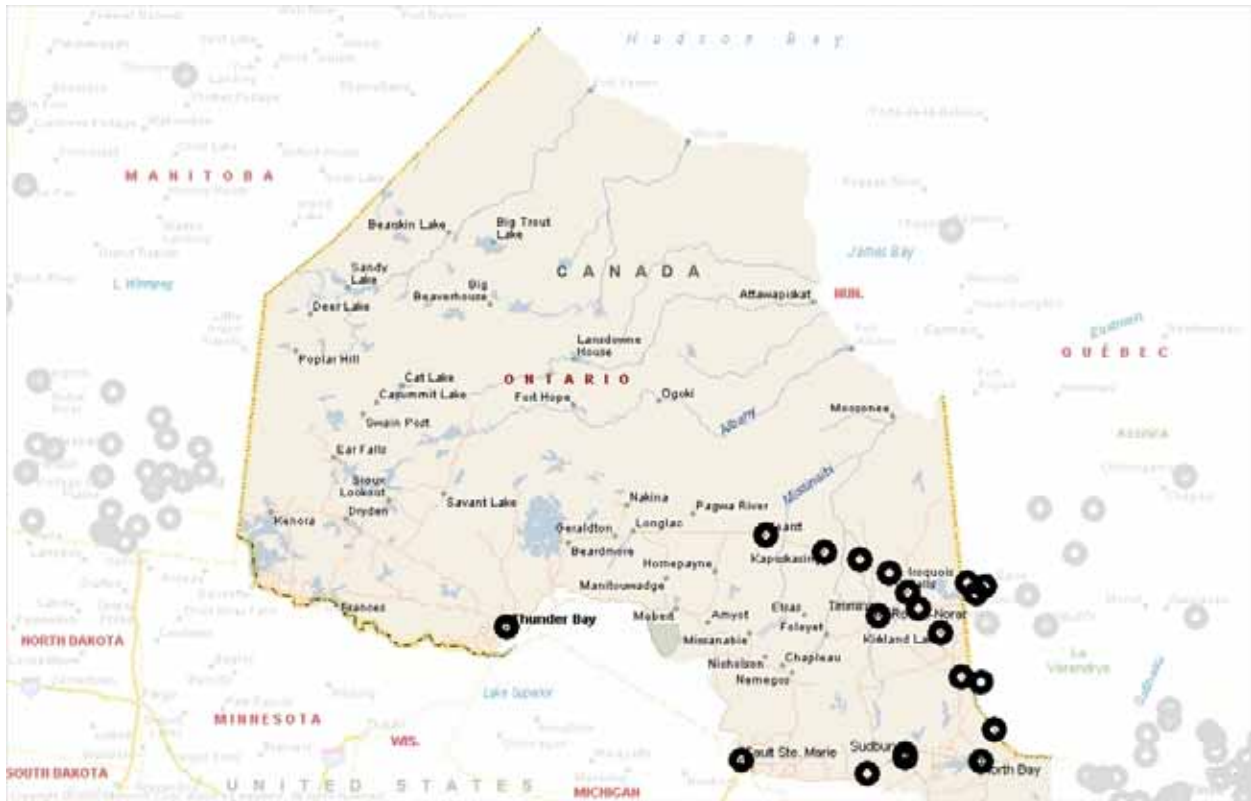


Figure 2 Drop-off location distribution map

### 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

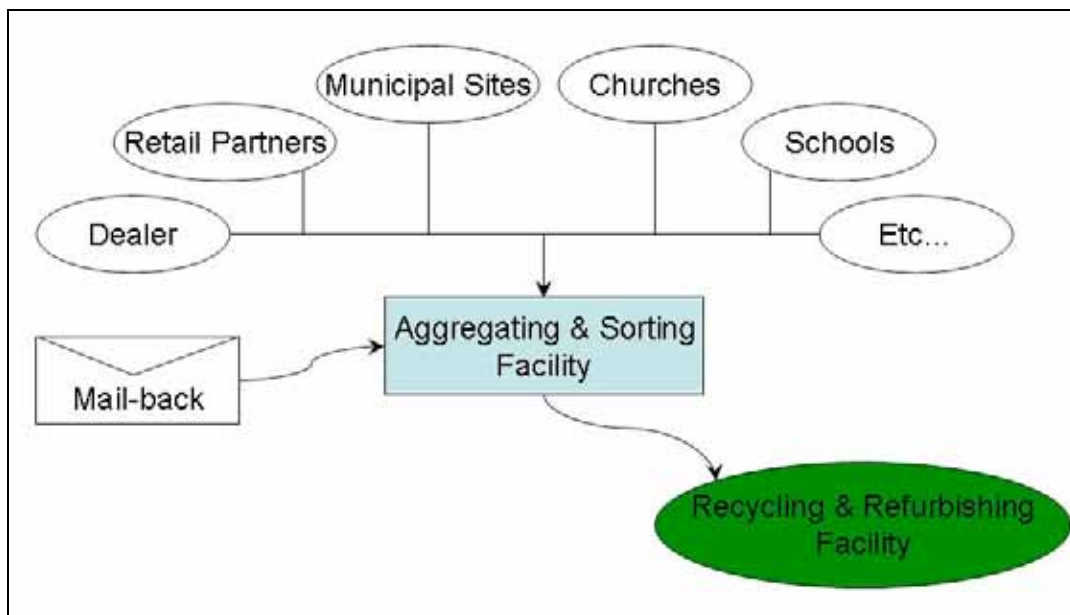
Consumers who are unable to access a collection site will be able to recycle their devices and accessories using a variety of postage-paid mail-back options from participating brand owners. Mailing labels can be accessed through the [recyclemycell.ca](http://recyclemycell.ca) site and can be used for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

Approximately 96% of a mobile device's weight is recyclable. 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 for power, cracks, chips, functionality, etc. 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 recyclers' requirements for resale are reintroduced into the market. Product recyclers take it upon themselves to advertise the qualified products and sell them at discounted rates. It is important to note that while there is a well established market for refurbished phones in developing countries, 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 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

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

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

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 recyclers 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:

- **Reuse** – Recyclers inspect and test handsets to certify them for reuse. This process includes removing any asset tags and all traces of personal and corporate information. 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.

Approximately 96% of a mobile device's weight is recyclable. 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** – 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.

## **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, and collection sites 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 (brochure and tent cards) 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 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

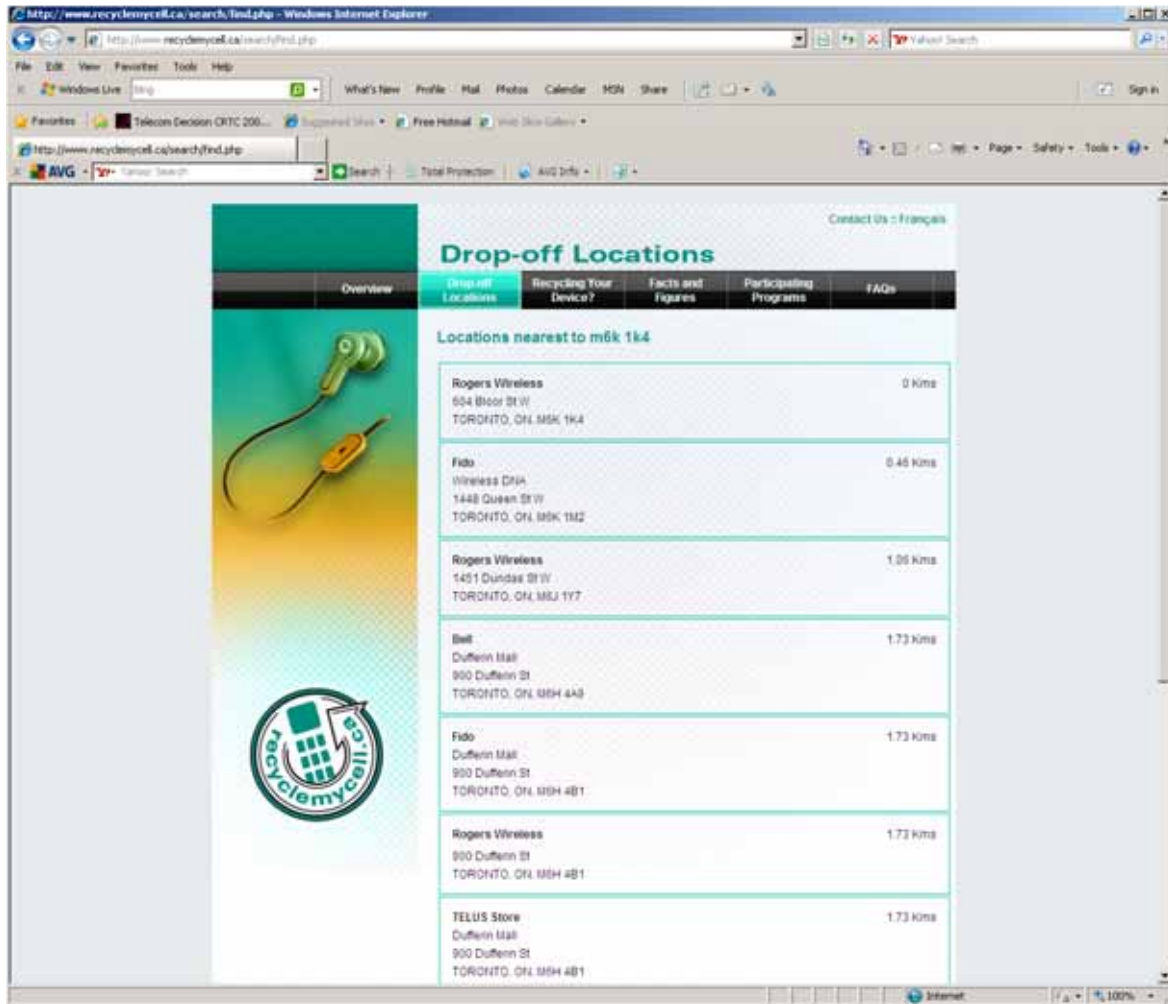


Figure 5 Search results page for nearest drop-off locations

### 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 D*.

### **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 and consumer awareness.

### **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.

### **2.15 Annual Reporting**

#### **2.15.1 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	CWTA Estimated Collection (Targets)	Collection Rate
2006	772,936	73,082*	9%
2007	863,856	132,691*	15%
2008	969,698	139,853*	14%
2009	1,078,427	194,150**	18%
2010	1,198,763	299,691	25%
2011	1,311,842	393,553	30%
2012	1,131,461	396,011	35%
2013	1,218,991	487,596	40%

\* 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 estimates 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.

Table 1 shows the Available for Collection estimates developed using the Life Cycle Model (described in *Appendix F*), 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. *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 no longer be used. Since the industry has net positive growth, there are at least as many sales as people churning, therefore *churn* gives an accurate idea of phones entering the market.

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 this year.

Collection targets for 2010-2013 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 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 25% (from 18% 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 rate by an additional 5% per year up until 2014. By 2014 the Recycle My Cell collection rate will be targeted at 45%.

Comparatively, CWTA calculates that OES has a collection target rate of 44%<sup>4</sup> in their 5<sup>th</sup> year which is in line with the CWTA collection target rate of 45% in 2014. OES' collection target rate increases by about 3% per year<sup>5</sup>. CWTA believes that the collection targets outlined in Table 1 are both realistic and attainable.

- Awareness
  - Indicator: Percentage of population aware of the program.
  - 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 April 2008 national Harris/Decima survey, 45% of current cell phone users<sup>6</sup> and intenders<sup>7</sup> in Canada are aware of recycling programs.

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<sup>4</sup> See Table 2 **CWTA and OES Collections/Targets (tonnes)**.

<sup>5</sup> See Table 2 **CWTA and OES Collections/Targets (tonnes)**.

<sup>6</sup> Cell phone user is defined as an individual that owns a cell phone.

<sup>7</sup> Intender is defined as an individual that intends to purchase a cell phone.

Based on the responses provided to these surveys, the vast majority of the general public would use a cell phone recycling program if one were introduced in their area.

Target: Increase awareness of cell phone recycling among cell phone owners/intenders nationally to 60% by September 2010 and to 80% by 2015.

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](http://recyclemycell.ca) Web site in order to facilitate the recycling of mobile devices.

The CWTA commits to establishing participation and accessibility targets after the program has been operational in Ontario for one year.

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.

The cell phone recycling programs that fall under the Recycle My Cell banner have been operating for some time without any regulatory requirement being in place. Recycle My Cell leverages the existing business process for both service providers and recyclers. As such, the requirement to monitor and report performance on the amount and relative percentage of wireless devices that are managed at each level of the pollution prevention *hierarchy* is new and requires an evaluation and changes to current processes. This work is underway with service providers and recyclers working together to develop an appropriate method to report on the post-collection fate of material.

The CWTA commits to working toward the establishment of a baseline for future targets after the program has been operational in Ontario for one year.

- **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 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.

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 B*), 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.

### **2.15.2 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 2.15.1 will also be reported in order to better evaluate the program's success.

### **2.16 Consultation**

CWTA is in the process of undertaking consultations with the following groups in the development of its ISP:

- OES
- Ontario municipalities
- WDO Public Affairs Committee
- Ministry of Environment
- Environmental NGOs
- General public

## **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	CWTA Estimated Collection	Collection Rate	OES available for Collection*	OES Collection Targets**	Collection Rate
2006	154.59	14.62	9%			
2007	172.77	26.54	15%			
2008	193.94	27.97	14%			
2009***	215.69	38.83	18%	558	167	30%
2010	239.75	59.94	25%	623	205	33%
2011	262.37	78.71	30%	699	252	36%
2012	226.29	79.20	35%	806	311	39%
2013	243.80	97.52	40%	926	386	42%
2014			45%	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).

The CWTA estimates that 27.97 tonnes were collected in Ontario in 2008 and that approximately 38.83 tonnes of cell phones will be collected in 2009. This is an increase of almost 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 330% over what CWTA projects will be collected in the same year. When compared to the CWTA estimate of 27.97 tonnes collected in 2008, the OES collection target of 167 tonnes in 2009 translates into an increase of 497% 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 the past three years: 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 three 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 G, 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 recycling organization. Each participating recycling organization abides by stringent environmental regulations. Whenever possible, devices received are recycled through resale and those that can't be refurbished are broken down into their components, 96% of which are recyclable. 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>Donation Method</b>	<b>Back-End Recycler</b>	<b>Devices Accepted</b>	<b>Charitable Contributions</b>
Bell: Blue Box	77,743 mobile devices recycled in 2008	Accepted at any Aliant or Bell store or any authorized Mobility dealer  Mail-back label available on website	ReCellular	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	Mail-back label available on website	Global Electric Electronic Processing Inc. (GEEP)	All mobile devices as defined by this program from any manufacturer or carrier	N/A
MTS	6,600 mobile devices recycled in 2008	Accepted at any MTS Connect store or MTS dealers	GREENTEC	All mobile devices as defined by this program from any manufacturer or carrier	Proceeds from returned devices are donated to Resource Conservation Manitoba
Rogers: Phones for Food	146,111 mobile devices recycled in 2008	Accepted at participating Phones for Food locations and through postage paid mail-back bag included with purchase of Rogers devices	ReCellular	All mobile devices as defined by this program from any manufacturer or carrier	Funds raised are donated to local food banks
SaskTel: Phones for a Fresh Start	Approximately 3,900 mobile devices recycled in 2008	Accepted at any SaskTel store or participating dealer locations	ReCellular	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).
TBayTel	Approximately 970 mobile devices recycled in 2008	Accepted at the Victoriaville Civic Centre or Canada Games Complex or participating TBayTel Mobility locations	The Wireless Source	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	Accepted at any TELUS Mobility store or participating dealer location	Global Electric Electronic Processing Inc. (GEEP)	All mobile devices as defined by this program from any manufacturer or carrier	Through Tree Canada, a tree is planted for every device collected
Videotron - Allo la Terre	30,000 mobile devices recycled in 2008	Accepted at any Le SuperClub Vidéotron stores, Videotron stores and counters, or Archambault stores in Quebec	FCM Recycling Inc.	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.
Virgin Mobile Canada: Red is the New Green	Program launched on October 5, 2009.	Accepted at any Virgin Mobile location in Canada	Sims Recycling Solutions	All mobile devices as defined by this program from any manufacturer or carrier	N/A

## **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 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.4 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 \$500,000 has been generated for food banks across the country to-date, and over 370,000 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.5 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.6 TBayTel**

Consumers can donate used mobile devices through participating TBayTel dealer store locations. 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. P.R.O. Kids works in partnership with Pitch-In Canada to recycle the phones, and the money collected is used to provide youth and children in need with community-based recreational activities.

#### **A.7 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.8 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.

#### **A.9 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.

## Appendix B, 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.rbrc.org/call2recycle>
- There are also many U.S.-based cell phone collectors that accept products by mail.

## 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	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	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	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	Rogers Wireless
LONDON	Rogers Wireless	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 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	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	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
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
NORTH YORK	Rogers Wireless	Rogers Wireless
NORTH YORK	Fido	Rogers Wireless
NORTH YORK	Fido	Rogers Wireless
NORTH YORK	Fido	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	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	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	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
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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	Fido	Rogers Wireless
TORONTO	Fido	Rogers Wireless
TORONTO	Fido	Rogers Wireless
TORONTO	Fido	Rogers Wireless
TORONTO	Fido	Rogers Wireless
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, Example Promotional Materials

### D.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

**A**s 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.

**D.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 © 2009. Funds raised by WWF-Canada Blue Box for Nature go to support WWF-Canada's "WWF" is a WWF Registered Trademark. WWF, WWF, WWF.

**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 Wireless is a service of Rogers Communications Inc. and is not a carrier. All other trademarks belong to their respective owners. © 2009 Rogers Wireless. 2009-0-001-000

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.



Recycle your old phone  
for food for your loved ones

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



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



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



Where business is going

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



Figure 12 In-store poster of Fido *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



### D.3 Mail-back Labels

**Donate your used cell phone and feed someone in need!**  
**Faites don de votre ancien téléphone cellulaire et donnez à manger à une personne dans le besoin!**



**Proceeds from your recycled cell phone benefit your local food bank**  
**Le produit du recyclage de vos téléphones cellulaires ira à votre banque alimentaire locale.**



**ROGERS™**  
 National Wireless Sponsor  
 Commanditaire national pour le sans-fil

[www.PhonesForFood.com](http://www.PhonesForFood.com)  
 is a multi-award winning project of the Canadian Association of Food Banks

[www.echangececlubouffe.com](http://www.echangececlubouffe.com)  
 est un projet de l'Association canadienne des banques alimentaires qui a remporté de nombreux prix

**STEPS**

1. Deactivate your phone service.
2. Turn off the phone, and leave the battery attached.
3. Put the phone(s) in any type of box, bag or envelope.
4. Print pre-paid mailing label below and affix it to the box/envelope. Make sure any previous delivery address and bar codes are covered.
5. Place the box/envelope in the mail.

If you have more than one box to send in, please call 1-888-271-3641.

**ÉTAPES**

1. Désactiver votre service téléphonique
2. Éteindre le téléphone et laisser la pile à l'intérieur.
3. Placer le ou les téléphones dans une boîte, un sac ou une enveloppe.
4. Imprimer l'étiquette d'envoi affranchi ci-dessous et la coller. S'assurer que l'adresse et le code à barres précédents sont bien couverts.
5. Déposer la boîte ou l'enveloppe dans une boîte aux lettres.

Si vous avez plus d'une boîte à expédier, veuillez téléphoner au numéro 1-888-271-3641.

**From/Exp. :**

Name/Nom : \_\_\_\_\_

Company/Compagnie : \_\_\_\_\_

Street/Rue : \_\_\_\_\_

City/Ville : \_\_\_\_\_

Postal Code/Code postal : \_\_\_\_\_



C M E B



Regular Parcel    Colis standard

**7242485**

RETURN POSTAGE GUARANTEED  
PORT DE RETOUR GARANTI

**Regular Parcel    Colis standard**

Return Service    Service de retour

**3**



**To/Dest. :**    UNIGISTIX  
 8590 AIRPORT ROAD SUITE 1  
 BRAMPTON ON L6T 0C3    **L6T**



L6T0C3+D

Sender warrants that this item does not contain dangerous goods.  
L'expéditeur garantit que cet envoi ne contient pas de matières dangereuses.

33-085-632 (13-10)

Figure 15 Example mail-back label for Rogers's *Phones for Food* program

## D.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

[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 2008 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 & traveling](#)[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

PHONES
PLANS
HOT OFFERS
STAY CONNECTED
VIRGIN MOBILE LIVE™
HOW DO I?
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](#)

<b>Phones</b>	<b>Plans</b>	<b>Hot Offers</b>	<b>Stay Connected</b>	<b>Virgin Mobile Live™</b>	<b>How Do I?</b>	<b>Why Choose Us?</b>	<b>My Account</b>
Prepaid Accessories	mPlan™ BlackBerry® Prepaid	Promotions Contests Kioskbacks myVIP Rewards™	Text messaging Text 800-ons Instant messaging	Download store 1st Dibs™ Pic and Vid Sharing	FAQs Where to buy User guides Customer updates	Your choice You Can Switch News and media Be A Do Gooder Jobs	Log In

<a href="#">Contact Us</a>   <a href="#">Store Locator</a>   <a href="#">Coverage Maps</a>   <a href="#">Sitemap</a>   <a href="#">Legal</a>   <a href="#">Français</a>   <a href="#">Virgin.com</a>	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

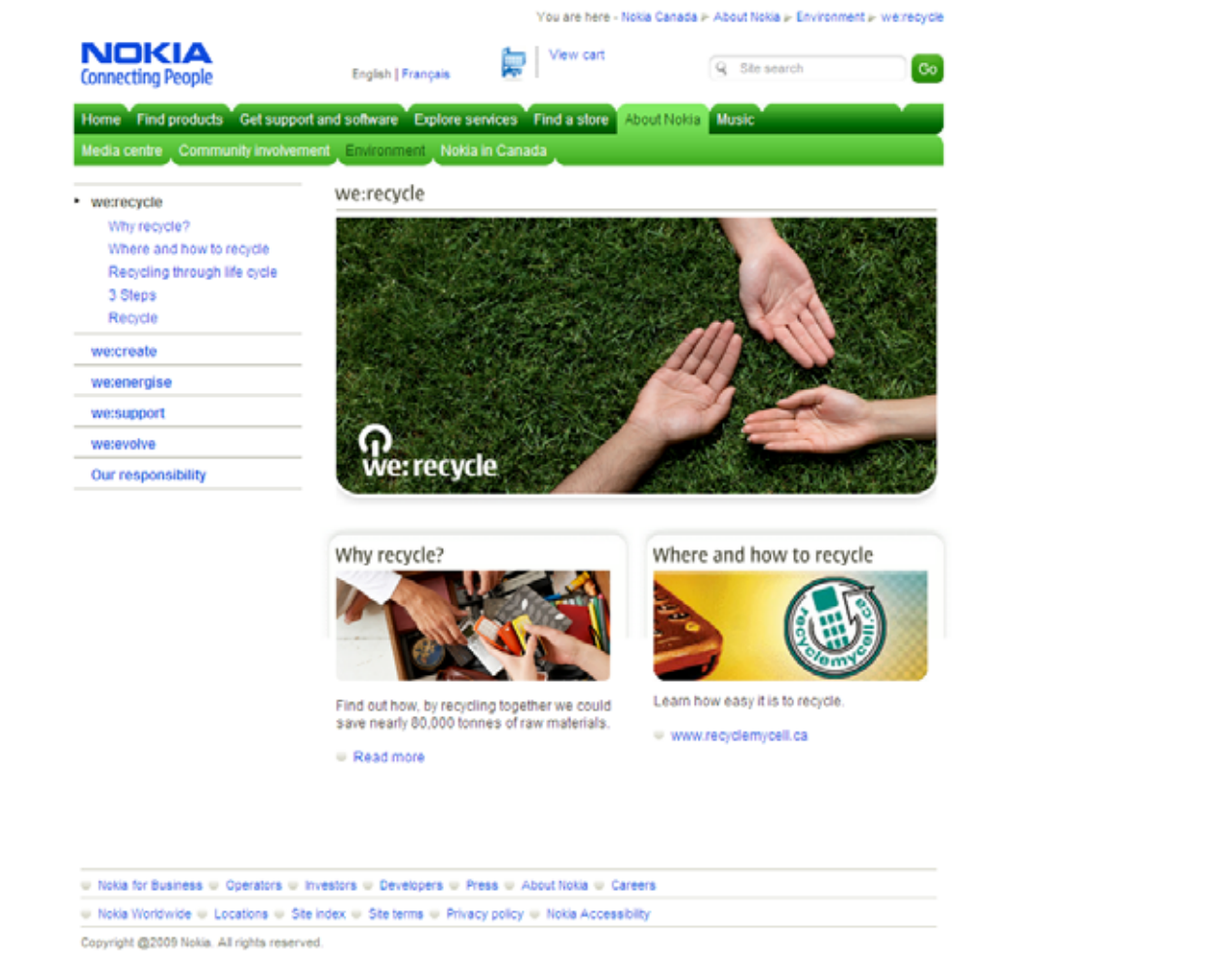


Figure 20 Snapshot of Nokia.ca's recycling webpage

## **Appendix E, Certifications Descriptions**

### ***E.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.

### ***E.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 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).

The LCM is based on assumptions that were developed as a result of combining data from 3 surveys that dealt with how consumers disposed of their cell phones: the first was a Canadian survey conducted by Decima in 2005 on behalf of the CWTA; the second, an Australian survey conducted by Ipsos in June 2007; and the third, an American survey conducted by iSuppli in the fourth quarter of 2007. The data from each survey was taken and given equal weight in order to develop an estimation about the average length of life, or lives, of a cell phone.

Most phones are assumed to have a lifespan of either three 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 17% 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 76% 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 2 years on average, at which point the phone becomes available for collection. The total lifespan of a phone that goes through both a *first* and *second life* is 5 years.



The LCM utilizes *churn* data collected since 2001 as an input. Churn is defined as the number or proportion of subscribers who leave their carrier over a period of time. These numbers were put through the life cycles in order to give an estimation of how many phones are available for collection each year.

Once the *available for collection* data is calculated it can be combined with the actual cell phone collection data, which the CWTA has been acquiring since 2005, so that *collection targets* can be set.

Table 4 Life Cycle Model

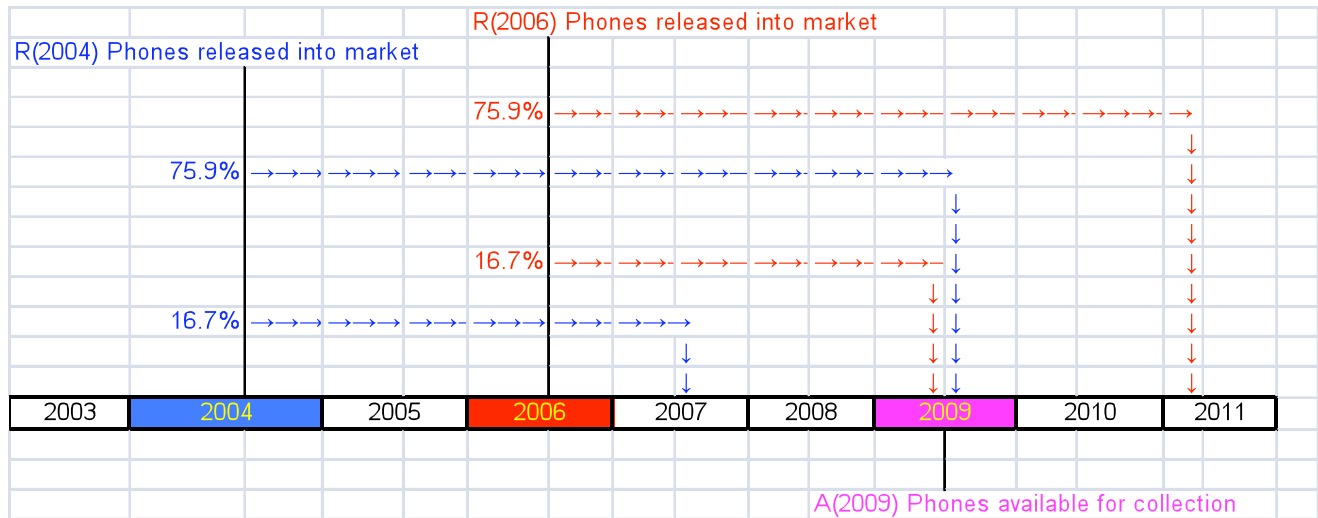


Table 4 shows how the Life Cycle Model identifies the number of phones that are available for collection in a given year. To determine the number of phones available for collection in 2009 it is necessary to consider both 2004 and 2006 data, as well as the *first* and *second life* of the phones.

Of the phones released into the market in 2004 16.7% of them will be available for collection in 2007 at the end of their *first life* (three years after entering the market). The remaining 75.9% will continue into a *second life* that will last an additional two years. These phones will become available for collection in 2009. During this same period, 16.7% of the phones that were released into the market in 2006 will be completing their *first life* and will also become available for collection in 2009.

Therefore, 2009 *available for collection* figures are made up of phones from 2004 that on average had a life of 5 years (*first* and *second life*) and phones from 2006 that on average had a life of 3 years (*first life*).

The CWTA has been keeping track of 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, 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.

T 613 233 4888 F 613 233 2032 www.cwta.ca  
1110-130 rue Albert Street Ottawa, ON K1P 5G4

## 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**

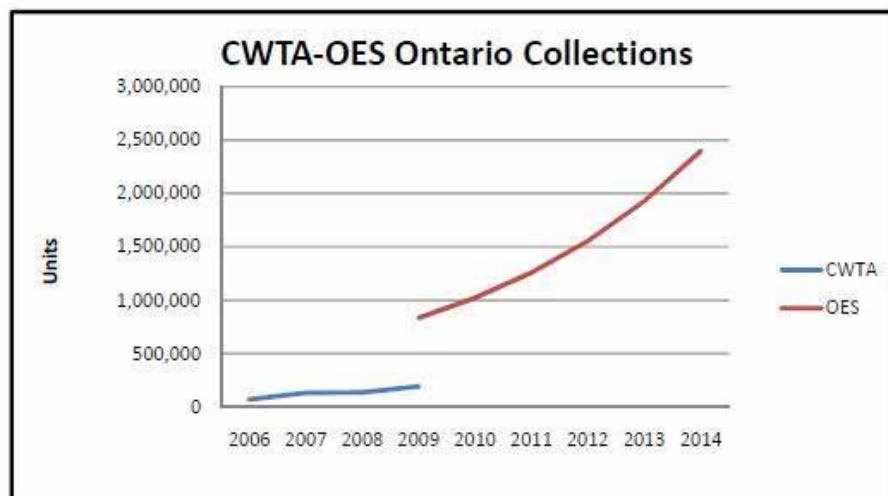
	CWTA (actual)	OES (projected)	Inflation		Realistic OES Collection Targets
			%	Units	
2006	72,932				
2007	132,691				
2008	139,853				
2009	194,150	835,000	430%	640,850	194,150
2010		1,025,000	430%	786,672	238,328
2011		1,260,000	430%	967,031	292,969
2012		1,555,000	430%	1,193,439	361,561
2013		1,930,000	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\*\*\*\*