



# **Recycle My Cell Three Year Business Plan 2014 to 2017**

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Alberta Environment and Sustainable Resource Development

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## 1. Accountability Statement

The Recycle My Cell (RMC) Business Plan for the period January 1, 2014 through December 31, 2017 was prepared in accordance with: the Memorandum of Understanding in place between Canadian Wireless Telecommunications Association (CWTA) and Alberta Environment; and the requirements of Section 16 of the *Designated Material Recycling and Management Regulation (Alberta Regulation 93/2004)*, as amended, which was enacted under the Environmental Protection and Enhancement Act.

The Government of Alberta's and Department of Environment's Business Plans and priorities were taken into account in the development of the RMC Business Plan.

In addition, CWTA has also taken into consideration work that is being conducted, and of which it is part, in other jurisdictions so that the best practices that have been identified and implemented are harmonized to the greatest degree possible.

RMC is committed to achieving the objectives laid out in this Business Plan, working cooperatively with other provincial stakeholders.

## 2. Introduction

### ***Who We Are***

The Canadian wireless telecommunications industry, under the auspices of the Canadian Wireless Telecommunications Association's (CWTA) Recycling Committee, developed Recycle My Cell, a free national cellular phone recycling program.

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.

CWTA is the authority on wireless telecommunications issues in Canada. The members of CWTA include, among others, wireless service providers, wireless handset manufacturers and processors. Recycle My Cell is made possible with participation from: Bell, BlackBerry, Eastlink, GEEP Inc., GREENTEC, LG Electronics Canada Inc., Lynx Mobility, Motorola Mobility, MTS, Nokia, ProMobility, Rogers Communications, Samsung Electronics Canada Inc., SaskTel, Sims Recycling Solutions, Sony of Canada, TBayTel, TELUS, Videotron, and Virgin Mobile Canada. Participating wireless providers currently operating in Alberta include: Bell, Rogers, TELUS, and Virgin Mobile.

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

As a voluntary program, Recycle My Cell meets the expectations of Alberta Environment and Sustainable Resource Development, as well as recycling regulations in place across Canada. The operations and objectives of the program are fully consistent with the principles elaborated in Alberta's *Environmental*

*Protection and Enhancement Act, Designated Material Recycling and Management Regulations and Electronics Designation Regulation.*

Consistent with the principles set out in Alberta's legislative and regulatory framework for electronic recycling, CWTA will ensure that the Recycle My Cell program 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 Alberta Environment and Sustainable Resource Development 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.

## ***Our Mandate***

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 was tasked with creating a national industry-wide umbrella recycling program.

CWTA manages 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, comprised of carriers, handset manufacturers and certified processors, will act as advisers to the Association on the operation and further development of the program. Each obligated brand owner is represented at the CWTA Recycling Committee.

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

CWTA shares the goal of harmonization of rules and regulations across the country with other stewards operating programs that are multi-provincial or national in scope. Where possible CWTA has worked with stakeholders to ensure that program rules are aligned for RMC in each jurisdiction in which it operates and are also aligned with known national and international best practices. Harmonization ensures that a consistent program is delivered to all Canadians, and also ensures that program members are able to find operational efficiencies that allow them to provide RMC free of charge.

### **3. Recovery of Mobile Devices within Alberta**

#### ***What We Do***

RMC is a cell phone recovery program. The primary objective of RMC is to minimize the introduction of wireless devices into Alberta's landfills.

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.

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.

#### ***RMC Program Overview***

While Recycle My Cell was formally recognized within the province of Alberta in June 2011 it has been operating voluntarily within the province since 2009.

Under RMC, brand owners continue to operate their own corporate programs to collect, reuse and recycle mobile devices. Many of these programs were initiated and established well before regulated Extended Producer Responsibility e-waste programs were in place in Canada.

RMC uses three mechanisms for device recovery:

- Return-to-retail partner locations: Consumers can readily return mobile devices at all participating retail stores operated by brand owners within the province during normal business hours.
- Voluntary third-party locations: Consumers are able to return devices to third-party locations, such as depots, municipal offices, etc. where these locations choose to participate as drop-off locations.
- Mail-back: Consumers are able to mail back unwanted devices, via Canada Post, using postage-paid labels when it is not convenient for them to return the devices to a drop-off location.

Devices that have been collected by participating locations are sent to certified processors for proper handling. Processors typically sort the material into three categories – resalable devices, recyclable devices and accessories, and batteries.

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 specific functionality requirements for resale are reintroduced into the market.

All batteries are sorted by chemistry (i.e., nickel-cadmium, nickel-metal-hydride, lithium-ion, small-sealed-lead, mixed); they are sent to appropriate downstream processors where metals are reclaimed.

## 4. Strengthening RMC in Alberta

CWTA and its members are committed to the long-term feasibility of Recycle My Cell. All stakeholders in the chain – from manufacturer to carrier to processor – continuously look for ways ensure that the environmental impacts of the devices at all stages of their life are minimized.

### ***Objective 1: Improve Public Education and Awareness***

CWTA, and its participating members, have undertaken various promotional activities to raise awareness about the importance of cell phone recycling in general, and the Recycle My Cell program specifically.

Consumers are an integral component of the recycling chain. They make the ultimate decision as to what happens to their devices.

Based on a survey conducted by Quorus Consulting, it was determined that 49% of Albertans knew about cell phone recycling programs in general in 2012 which is just below the national average (50%) and a decrease of 5 percentage points over 2011 provincial results. When asked, 16% of respondents said they were aware of the RMC brand, an increase of 2 percentage points over 2011.

CWTA intends to raise awareness utilizing a combination of the initiatives listed below.

***Sponsorship of events:*** CWTA has sponsored relevant events like Waste Reduction Week in Canada and the Recycling Council of Alberta's annual conference in order to increase visibility with audiences that are able to help further the objectives of Recycle My Cell within the province. In addition to being a sponsor, Recycle My Cell also attended the 2013 Recycling Council of Alberta's annual conference and tradeshow to promote and establish the RMC brand and to build new relationships in an environment conducive to networking.

Based on results and review of these types of sponsorship opportunities, CWTA will determine its participation in similar events on a case-by-case basis.

***Participation at trade shows and fairs:*** CWTA has dedicated efforts to reach out to municipalities by showcasing RMC at the 2013 Sustainable Communities Conferences and Trade Show, as well as FCM's 2013 Annual Conference and Tradeshow. Including municipal locations as RMC drop-off locations is an important element to increasing awareness, as well as ensuring consumer accessibility.

CWTA will continue to reach out to a wide variety of municipalities and councillors by participating at trade shows and by sending targeted mail-outs to provide them with in-depth information regarding Recycle My Cell.

***Paid advertising to support specific events:*** CWTA has developed and run RMC ads in select markets to coincide with targeted events, like Earth Day, as appropriate.

The majority of CWTA's advertising efforts will continue to focus on alternate advertising methods, such as Google and Facebook ads, which offer a more targeted approach to providing information to those searching for it on-line.

Delivery of the RMC message is most essential at the time that a consumer has made the decision to search out the information since that is when they are most likely to act upon it.

**Social Media:** CWTA has updated the RMC Facebook page to include additional detailed information for users to learn how to host a drop-off location; this type of information was previously only available on the Web site or by contacting CWTA directly.

CWTA is developing a strategy to engage its current followers more fully by providing useful information about recycling in general, and highlighting the ease and benefit of recycling devices.

Additionally, Twitter (@RecycleMonCell) will be used to further promote messages about RMC to followers.

Ongoing support for the program is provided via the activities listed below:

**RMC Web site and Toll-free number:** Recyclemycell.ca and recyclemoncell.ca will continue to serve as the central hub for the program. The Web site provides information about the RMC recovery program, member programs, current collection sites, and steps to clear personal information from a device before it is recycled.

This site also includes links to the mail-back options that are in place through member programs; this provides an additional level of service to those living in more remote communities, or those simply looking to return their device by mail.

Consumers with additional questions about the program are encouraged to contact RMC representatives via an email address that has been established for this purpose (info@recyclemycell.ca / info@recyclemoncell.ca). Consumers can also speak with a RMC representative via a toll-free phone number (1-888-797-1740).

In addition, participating carriers and manufacturers include information about recycling on their respective Corporate Web sites.

**RMC material on stakeholder Web sites:** CWTA will continue to work with other stewardship organizations, recycling councils and third-parties to ensure relevant information is provided to consumers.

The primary focus of this activity is to ensure that information about cell phone recycling is made available to consumers through Web sites that deal with waste reduction activities in their specific communities, or through sites that are known to be trusted sources of information.

**Promotional materials (including recovery boxes, brochures, posters, tent cards and banner/button ads) for municipal and other Third-party sites:** In an effort to increase the number of drop-off locations hosted by municipalities and community groups, and increase program visibility, the CWTA has developed a generic recovery program. Third-party locations, such as municipal waste depots, not for profit organizations and other parties not affiliated with current RMC members, are encouraged to participate in the program. The bilingual brochure provides details about the RMC program, including the revamped Web site and mobile friendly Web site address and toll-free number for those requiring further information. The 5"x7" bilingual tent card or 11"x17" poster (available in either English or

French), identifies the municipal site or dealer site as a RMC drop-off location and includes the Web site address.

CWTA will continue to provide information to third-parties.

**News Canada stories for inclusion in newspapers or Web sites:** CWTA will continue to use News Canada as a valuable tool for program promotion. News Canada is a paid service that provides articles, free of charge, for use by publications and Web sites. This has shown to be an effective way of including the Recycle My Cell story in community newspapers and on Web sites that often look for content from external sources. These story pick-ups are then monitored and tracked by News Canada and that information is provided to the CWTA.

**Press releases highlighting latest developments regarding RMC:** CWTA develops and distributes both targeted and national press releases to coincide with activities RMC participates in.

**Earned media:** When possible CWTA will continue to honour media requests for information and opportunities to discuss the program via interviews. As an authority on the wireless industry, CWTA is best positioned to speak about the positive steps the industry has taken to properly deal with its end of life materials.

CWTA will review the results of its annual survey to ascertain trends in consumer awareness and behaviour concerning cell phone recycling. Based on those results CWTA will work to devise program promotion initiatives with the goal of increasing the level of awareness concerning cell phone recycling.

**Public Education and Awareness Targets**

Target: Achieve an awareness rate as outlined in the table below.

Year	Cell Phone Recycling Awareness in Alberta		Recycle My Cell Awareness in Alberta	
	Target <sup>+</sup>	Awareness Level as determined by consumer survey	Target <sup>+</sup>	Awareness Level as determined by consumer survey
2008		49%		
2009		54%		5%
2010		51%		10%
2011	64%	54%	11.50%	14%
2012	68%	49%	13%	16%
2013	72%		14.50%	
2014	76%		16%	
2015	80%		17.50%	

<sup>+</sup> CWTA considers the targets noted in the table to be aggressive, but they are in-line with the national awareness targets that have been set for the program.



- Indicator 1: 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.
- Indicator 2: Number of visitors to the recyclemycell.ca Web site.
- Method to evaluate: Tracking of number of visitors to the recyclemycell.ca Web site.

CWTA will report on its progress as part of its Annual Report obligation to Alberta Environment and Sustainable Resource Development.

## ***Objective 2: Ensure Continued Public Participation and Program Accessibility***

CWTA and its members support a return-to-retail model for collection drop-off sites. It is felt that the most effective method for cell phone recovery is simply dropping off an existing device(s) when a new one is purchased.

Participating locations that are included in the RMC database collect all devices regardless of make, model or condition in order to provide consumers with the convenience that they seek.

In instances where a drop-off location is not available, RMC will continue to offer several mail back options through its member programs which will allow any consumer in the province – with access to Canada Post service – the ability to conveniently and easily return their devices and accessories at no cost to themselves.

***Return-to-retail partner locations:*** There are currently 446 drop-off locations in 75 communities across the province of Alberta. Where there is the ability to use a cellular phone there is generally a retailer and therefore a means to recycle it.

CWTA will continue to work with its members to ensure that the list of collection sites noted on recyclemycell.ca is updated on a regular basis to allow consumer access to the most current information available.

***Voluntary third-party locations:*** Recycle My Cell provides an easy and effective method for municipalities, community partners and other organizations to become involved in the recycling effort. Any municipal location, charity organization or corporate/private initiative that wishes to act as a collection site will be able to join the program as a collector.

In addition to program information that will be available on the recyclemycell.ca Web site and Facebook, RMC representatives will reach out to municipalities and those wishing to participate as a drop-off location.

Promotional materials and box delivery and pick-up will be provided to all participants at no cost.

***Mail-back option:*** Recycle My Cell will continue to offer links to a variety of postage-paid mail-back options for anyone currently unable to reach a drop-off location for any reason. The use of Canada Post ensures that even small and remote communities have access to the service.

**Public Participation and Program Accessibility Targets**

Target: Increase the number of Recycle My Cell drop-off locations by 1% per year from 2012 to 2015.

Year	Recycle My Cell	
	Drop-off Locations	
	Target	Actual
2011		456
2012*	461	446
2013*	465	
2014*	470	
2015*	475	

\* Targets for 2012 to 2015 were revised last year to take into account changes to the actual number of drop-off locations in 2011. CWTA has opted to maintain the targets at their current level and will work to bridge the current gap.

- 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.

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

Year	Recycle My Cell	
	Consumer Satisfaction*	
	Target	Satisfaction Level as determined by consumer survey
2011	100%	92%
2012	100%	95%
2013	100%	
2014	100%	
2015	100%	

\* Consumer satisfaction is measured at a national level. Data specific to Alberta is not available.

- Indicator 1: 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.
- Indicator 2: 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.

CWTA will report on its progress as part of its Annual Report obligation to Alberta Environment and Sustainable Resource Development.

### ***Objective 3: Increase Collection Rates***

The CWTA believes that the strategies outlined in Objective 1 and 2 will help facilitate an increase in the number of phones kept out of Alberta's landfills. CWTA notes, however, that an increase in consumer awareness concerning cell phone recycling does not guarantee that the devices will be recycled through RMC and as such the need to look at the full picture in Alberta becomes increasingly important.

Cell phone recycling is a lucrative endeavour, often used by for-profit and charitable organizations as a source of revenue. While efforts are made to funnel devices through the Recycle My Cell program the ability of other programs to continue their work is one of the basic tenants of the program.

Given the retained monetary value for some devices, consumers are turning more often to resale as desired options once they no longer want their device. Through Kijiji, and other such sites, as well as third-parties that offer monetary incentives, there are an increasing number of options available to consumers that fall outside of regulated solutions. There is no ability to account for the volume that this may represent.

In order to provide a fuller view of recovery within Alberta CWTA will continue to:

- work with other known organizations (for example, Call2Recycle) within the province, where feasible, to ensure relevant data is reported;
- work to identify other organizations that are large purchasers – big box stores, the provincial government, large utilities – of mobile devices in order to investigate their inclusion in RMC; and
- work with members to identify the various means in which they recover devices. It is important to factor this data into the discussion about cell phone recovery because these devices represent material that has been effectively removed from the “available for collection” pool but without any formal mechanism to account for it. In many cases, programs such as Trade-ins are serving to replace strictly voluntary recycling programs for members and are seen as an effective means by which to recover devices that are more suitable for reuse.

CWTA would respectfully submit that recovery programs operating within the province with the government's blessings be supported by the government in their efforts to recover obligated materials. The objective of improved collections is a shared objective.

## Collection Rate Targets

Target: Achieve a collection rate as outlined in the table below.

CWTA Available for Collection, Estimated Collection Targets and Collection Rate for Alberta

Year	CWTA Available for Collection (units)	CWTA Estimated Collection (targets, unit)	Target Collection Rate	Actual Recovery (units) <sup>#</sup>	Actual Collection Rate	RMC Member Internal Initiatives <sup>^^</sup>
2006	262,131	19,383	7%	19,383	7%	
2007	293,541	35,984	12%	35,984	12%	
2008	326,961	37,926	12%	37,926	12%	
2009	361,336	45,827	13%	45,827	13%	
2010	393,650	<b>59,048</b>	15%	34,795	9%	27,025
2011	424,199	<b>80,598</b>	19%	30,958	7%	82,621
2012	453,370	<b>108,809</b>	24%	60,231	13%	102,226
2013	481,023	<b>134,686</b>	28%			
2014	509,884	<b>168,262</b>	33%			
2015	540,477	<b>199,976</b>	37%			

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

\*\* 2009 was the first year collections were reported by province instead of an estimate.

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

\*\*\*\* Churn input into the LCM for 2010, 2011, 2012 and 2013 has been estimated, using a 6% growth rate year over year, in order to allow for the development of a full data set for the years 2012, 2013, 2014 and 2015.

<sup>#</sup>Actual Recovery represents the amount, in units, of cell phones collected each year through drop-off locations, the mail back option, trade-in programs (where applicable) and the RMC Waste Reduction Week Student Challenge.

<sup>^^</sup>CWTA, with its members, has devoted a substantial amount of time investigating how to incorporate data regarding other diversion methods employed internally for devices that are returned to members by other means.

- Indicator 1: Absolute collection<sup>1</sup>
- Method to evaluate: Devices collected on an aggregate provincial basis. This data will consist of two elements: the amount of material that is collected through a physical collection site and an estimate of the material that is collected through the mail-back option.

<sup>1</sup> CWTA will continue to report on the number of devices that are recovered by RMC. RMC data currently represents the results of consumer facing recovery initiatives that collect devices that are considered to be at the end of their useful life by their owners. These are devices that are returned by a consumer because they are meant to be recycled.

CWTA will continue to work with its members to more accurately identify the means in which these devices are recovered and to define the quantities that this represents on a provincial basis. CWTA continues to formally document process flows so that data concerning the other diversion methods employed internally for devices that are returned to members by other means can be included in the recovery totals.

- Indicator 2: Per capita breakdown of Aggregate Total of devices collected.
- Method to evaluate: Absolute collection can be further broken down to a per capita amount (percentage of product that has been collected relative to the size of the target community).

CWTA will report on its progress as part of its Annual Report obligation to Alberta Environment and Sustainable Resource Development.

## ***Objective 4: Facilitate Proper Post-collection Management of Materials***

### ***Management of Material***

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

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 defined functionality requirements for resale are reintroduced into the market. Those that are not suitable for reuse are sent to approved downstream processors where they are either disassembled for harvesting spare parts or ground down for the recovery of precious metals.

Device manufacturers continue to take steps to improve the recyclability of their devices, and processors continually refine their processes to reduce the amount of non-recoverable material associated with the recycling of cell phones and accessories.

Developing meaningful targets for reuse and recycling of wireless devices is challenging as focusing on one aspect of the hierarchy may work against the overall objective of diverting material from landfill for proper disposal. Products with a value at the end of their life – both as a whole, reusable unit, or broken into component parts and turned into commodities – are sought after in the open market.

While it is understood that reuse is preferable over recycling, whether a phone can be reused is dependent on numerous factors outside the control of RMC members. Where it is possible to reuse a phone, the phones are reused. However, it should be understood that phones that meet the criteria for refurbishment from a physical perspective (i.e. can power on, etc.) may not meet the criteria for marketability in that the technology is no longer seen as desirable by consumers. To reintroduce phones into the market purely to meet a defined volume target will prove to be harmful.

CWTA is currently investigating how management of collected material may be further verified as part of work currently being conducted in British Columbia; this work involves the Ministry of Environment staff, auditors, as well as other stewardship agencies. Once this work is complete, CWTA will consult with Alberta Environment and Sustainable Resource Development concerning its transferability.

### ***Processor Certifications***

All of the processors involved with the RMC program hold valid ISO certifications and/or are verified to national standards (Electronic Product Stewardship Canada's (EPSC) Electronic Recycling Standards (ERS)) or international standards meaning they have an environmental management system in place which ensures accountability and knowledge of the associated environmental impacts.

Given that the processors used by RMC members hold multiple certifications and are all legitimate businesses with reputations to protect, it is within reason to believe that the methods by which they deal with products collected through the RMC stream would be no different than those collected by other streams.

All members of the recovery chain – from carrier to processor – have a vested interest in ensuring proper processes are followed at all times.

### ***Post-collection Management of Materials Targets***

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

- Indicator: Post-collection fate of material.
- Method to evaluate: Figures provided from recyclers concerning the allocation of RMC recovered devices that were reused, recycled, recovered as energy and land-filled as defined in the pollution prevention hierarchy.

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

- Indicator: Post-collection fate of material.
- Method to evaluate: Figures provided from recyclers concerning the allocation of RMC recovered devices that were recycled<sup>2</sup>.

Target: Ensure that certifications held by processors associated with RMC are valid and align with identified provincial requirements.

- Indicator: Valid certifications of processors.
- Method to evaluate: Copies of valid ISO certifications to show compliance with applicable regulations.
- Method to evaluate: Web site listings for provincial programs that use same processors as RMC to show compliance with program certification.

CWTA will report on its progress as part of its Annual Report obligation to Alberta Environment and Sustainable Resource Development.

## **5. Conclusion**

CWTA and its members are committed to providing residents of Alberta with a free, convenient and accessible method to dispose of their unwanted wireless devices and accessories. Working together – with Albertans, Alberta Environment and Sustainable Resource Development and other stakeholders – will ensure that the objectives outlined in this plan are achieved.

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<sup>2</sup> CWTA is currently working on determining how to more effectively report on the post-collection management of materials so that the amount reused, recycled, recovered as energy and land-filled is better defined and understood.