



November 21, 2014

Government of Yukon  
Environmental Programs Branch  
Department of Environment  
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Whitehorse, Yukon Y1A 2C6  
[envprot@gov.yk.ca](mailto:envprot@gov.yk.ca)

### **Re: Review of the Recycling System – Under the *Environment Act***

1. The Canadian Wireless Telecommunications Association (CWTA) is the authority on wireless issues, developments and trends in Canada. It represents wireless service providers as well as companies that develop and produce products and services for the industry, including handset and equipment manufacturers, content and application creators and business-to-business service providers. CWTA is pleased to provide its comments about the proposed changes to Yukon's recycling system under the *Environment Act*.
2. CWTA administers Recycle My Cell, the free, national, industry-led, recycling program for mobile devices and accessories. RMC operates under a variety of regimes across the country – voluntary, MoU with government, and regulated – and as the program operator, CWTA has gained a unique perspective in administering provincial EPR and stewardship programs.
3. Although not stated in the consultation document, we understand that through the proposed amendments to the designated materials regulation – particularly those for the electronics products category – the territory will launch a government-run stewardship program for electronic products, including cell phones. As we will outline in more detail below, based on our experience operating provincial stewardship programs, we encourage Yukon to adopt a flexible, results-based approach to all aspects of its new electronics products recycling strategy.

### **Consider adopting RMC as the official stewardship program for cellphone recycling in Yukon**

4. RMC operates voluntarily in Yukon and will continue to do so alongside the government stewardship program. However, going forward, CWTA respectfully submits that RMC should be considered as the official stewardship program for cell phone recycling in Yukon. CWTA has the experience and expertise to launch and administer a program that is consistent with those in most other provinces and removes the burden from the Yukon government. The territory should therefore set a future date for an official program review at which time alternatives to the government stewardship program could be considered.

5. In the interim, CWTA is interested in exploring opportunities to expand the reach of RMC in Yukon to contribute to the collective goal of reducing the number of cell phones in the territory's landfills. As well, CWTA is available to discuss our stewardship experiences with the Department of Environment anytime.

### **Review the fee amount based on actual operational costs**

6. CWTA understands that Yukon's unique geography, infrastructure and demographics necessitate eco fees that are higher by comparison than those in other provinces. However, the proposed \$1/device fee is significantly higher than the 5-10 cent fees mandated in other provinces. CWTA submits that the fee should also be reviewed at a set future date to ensure it reflects the true operational costs.

### **Commit to two-way data sharing with RMC**

7. CWTA tracks the progress of Recycle My Cell in all provinces. Devices that are recycled through means other than RMC contribute to developing an overall picture of waste reduction in a jurisdiction, and help identify the impact of RMC itself. Similarly, RMC data will help Yukon identify the percentage of devices that are being recycled through means other than the government's stewardship program.
8. CWTA therefore is committed to providing its annual Yukon RMC figures to the territory, and will request that the government of Yukon share its data with CWTA.

### **Conclusion**

9. CWTA supports all efforts to reduce the volume of wireless devices that end up in landfills. We look forward to continuing to operate RMC in Yukon alongside the government's new stewardship program. We are available to provide any feedback that may be useful to the government as it launches and eventually reviews the stewardship program for electronic products.
10. We appreciate the opportunity to participate in this consultation.

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