



March 21, 2014

Manitoba Conservation and Water Stewardship
Environmental Programs and Strategies
1007 Century Street
Winnipeg, Manitoba R3H 0W4

Via Email: pollupreve@gov.mb.ca

Re: CWTA Comments, Manitoba Conservation and Water Stewardship is proposing changes to Regulations under *The Waste Reduction and Prevention Act*

1. The Canadian Wireless Telecommunications Association is the recognized 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, including handset and equipment manufacturers, content and application creators and business-to-business service providers. CWTA is pleased to file its comments with respect to the above-noted proceeding.
2. CWTA administers Recycle My Cell, the free, national, industry-led, recycling program for mobile devices and accessories, and the Producer Responsibility Organization for cellphone recycling in Manitoba. As such, changes to Manitoba's waste reduction regulations directly impact CWTA and its members.
3. We have reviewed the proposed changes to the regulations and generally supports the amendments. Specifically, the proposals to extend by 30 days the length of time for approved programs to file their Annual Reports, clarify that reporting by the approved programs is to be done on a calendar year basis, and remove the need for ministerial tabling of Annual Reports either coincide with existing Recycle My Cell procedures or reduce some administrative burden. CWTA therefore supports these three proposed amendments.
4. CWTA's only potential concern is with the proposal to give the Minister the ability to specify the content of Annual Reports. Recycle My Cell is the stewardship program for cellphone recycling in a number of provinces, each with its own annual report requirements. Currently, the annual reports in most provinces are required to include very similar information. This level of harmonization is very beneficial administratively and CWTA would prefer that it remain in place as much as possible.
5. While it is not overly problematic to accommodate some nuances in reporting requirements, wholesale changes that would make annual reports for Manitoba vastly different than in other provinces would greatly increase the administrative burden of Recycle My Cell. Thus, CWTA is not advocating for this proposed change to not be included in the regulations. Rather, we feel it prudent to appropriately caution the province about the potential negative impact of implement significant changes to annual reporting requirements.
6. CWTA appreciates the opportunity to participate in this consultation.

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